MERCURY REGULATOR REMOVAL PROGRAM

June 11 2001-R2

Overview

GAS OPERATIONS

MERCURY GAS REGULATOR REMOVAL PROGRAM

Program Overview

Gas regulators are used on service piping that is supplied by elevated pressure gas mains. The regulators reduce gas pressure in a customer's piping. Prior to the 1970's, certain gas regulators were made with approximately one ounce of mercury[1] contained in a cup inside the body of the mercury-containing gas regulator (MCGR). The mercury acts as a relief mechanism when an over pressure condition occurs on the service.

There are approximately 366,000 gas services on the Con Edison system. Of that total, approximately 122,000 services have gas regulators. As of January 1, 2001 approximately 32,000 of these regulators contain mercury.

Approximately 59,000 MCGRs were installed on Con Edison's gas system from 1945 to the mid-1970s. As of January 1, 2001, 27,000 of these MCGRs have been removed. The mercury-containing gas regulators that remain in our service territory are located in Westchester (26,000) and in Queens (6,000)[2].

In 1997, Con Edison started a formal program to eliminate at least 1,500 regulators per year. To expedite this program, Con Edison has established a goal to remove approximately 10,000 MCGRs per year beginning in 2001.

Removal Process

When Con Edison removes MCGRs, trained personnel follow a detailed procedure and take precautionary measures to prevent mercury spills. Our procedure requires the use of containment to capture mercury in the event of a mercury spill. If a spill does occur, notifications are made, qualified technicians clean up the spill and monitor the area when the clean up is completed.

Mercury Outreach Program

Con Edison is actively involved with the New York City Buildings Department and local plumbers associations in heightening the awareness of mercury.

Mercury is also used in pressure gauges called mercury manometers, which were required by local municipalities and are used by plumbers. In 1997 and in 1998, Con Edison conducted informational sessions with the New York City Plumbing Board, the New York City Building Department and the New York State Buildings Committee in Westchester. These sessions heightened the awareness of the hazards of mercury.

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[1] There are approximately 400 commercial regulators on the Con Edison system that contain approximately 3 ounces of mercury.

[2] According to our records, MCGRs that were located in the Bronx have been removed.

In 1999, Con Edison's lobbying efforts with the New York City Department of Buildings led to a change in the rules pertaining to the use of mercury manometers and they no longer mandate the use of mercury manometers.

Additionally, in the fall of 1999, Con Edison sponsored a mercury gauge exchange program. Approximately 100 mercury gauges were collected from plumbers and replaced free of charge with non-mercury, spring-loaded gauges.

During all these discussions, plumbers were specifically directed not to engage in the removal of regulators in our system.

Employee Mercury Awareness

Con Edison is constantly evaluating its procedures regarding the removal of MCGRs. Our goal is to ensure that all possible precautions are taken to prevent spills, and that proper containment is in place in the event of an accidental occurrence.

In an effort to keep Con Edison gas mechanics abreast of current industry issues about mercury regulators, refresher-training courses are periodically scheduled to remind them of the proper procedures for removing regulators. In addition, lessons-learned are conducted when a spill does occur and improved techniques are shared with the employees that perform this work.

Employee Training

All gas mechanics that work on the Mercury Gas Regulator Removal Program attend training courses related to mercury and gas regulator maintenance and removal as well as their other required training courses (e.g. OSHA Awareness Training, Hazardous Communication, General Environmental Instructions, General Safety Instructions). The courses are given at Con Edison's Learning Center gas system simulator areas and at actual work sites.

Program Monitoring

Employee Monitoring

All employees working on the Mercury Gas Regulator Removal Program have been offered an initial biological screening test conducted by a qualified person from the Company's Occupational Health Department.

Periodic screening tests shall be offered to all employees every six months after the initial screening test.

A qualified employee from the Company's Occupational Health Department conducts all testing. An independent, qualified laboratory analyzes all tests.

Personal mercury exposure monitoring is also conducted periodically by qualified technicians for employees while performing MCGR removals.

Vehicle/Equipment Screening

Vehicles and equipment used for the Mercury Gas Regulator Program are subjected to an initial screening inspection by qualified Chemical Services Laboratory (ChemLab) technicians to identify any contamination issues. The vehicles and equipment will be retested at six-month intervals or as necessary, for the duration of their use in the program.

Procedures

Procedures applicable to the handling, storage and disposal of mercury containing equipment are referenced in this section.

QA/QC

Gas Operations EH&S Group, Industrial Hygiene and Quality Assurance Group in conjunction with ChemLab conduct quality assurance reviews to validate procedures and execution of work:

- Perform field audits to verify compliance to existing procedures regularly to validate that the procedure is effective and that it is being followed.
- Conduct field assist visits to help mechanics problem solve site issues and perfect worker techniques.
- Perform periodic monitoring during MCGR removals using Jerome meters.
- Conduct QA/QC of disposal contractor

General Information

Technical Support Coverage

Twenty-four hour technical support coverage by various organizations within the Corporation is provided to support Gas Operations employees working on the program in handling emergencies, answering questions about procedures, medical exposures and for customer care.

Spill Prevention Kits

Mercury Spill Prevention Kits have been put into our class and stock system and made available to personnel involved in the mercury regulator removal program.

Project Schedule

The program is scheduled to be completed by December 31, 2003.

Procedures

Referenced Procedures
For
Mercury Regulator Removal Program

Corporate Environmental Procedures

CEP 4.1	Hazardous Waste Management Program Overview
CEP 10.01	Release Reporting Interim Procedure: Handling CESQG Waste
ES-030	Environmental Specification for the Management of Mercury Wastes not Covered by the Universal Waste Rule

General Environmental Instructions

GEI 2.01	Spill Response and Cleanup – Spill Reporting
GEI 2.23	Spill Response and Cleanup – Cleanup of Mercury Spills
GEI 6.06	Hazardous Waste Management – Removal, Spill Response, Storage & Disposal of Gas Regulators and other Mercury-Containing Equipment (Currently in Revision)
GEI 6.09	Hazardous Waste Management – Off-Site Shipment of Hazardous Waste
GEI 6.16	Hazardous Waste Management – Storage of Hazardous Waste in Drums

Corporate Safety Procedures

CSP 6.0	Medical and Exposure Reporting Notifications and Requests
CSP 11.0	Mercury Management Program

Corporate Safety Instructions

GSI 11.01	Mercury Management Program

Chemical Services Laboratory Procedure 119.15R

119.15R	Mercury Spill Cleanup Procedure

Customer Service Procedure 2-0-2

Customer Operations—General: Customer Care Emergency Response Plan

1.0 PURPOSE

IT IS THE POLICY OF CON EDISON TO COMPLY WITH ALL FEDERAL, STATE, AND LOCAL REGULATIONS PERTAINING TO HAZARDOUS WASTE MANAGEMENT. Compliance with environmental regulations will ensure that Con Edison conducts its operations in a manner that protects human health and the environment. These procedures have been prepared to provide an overview of the regulatory requirements that govern the generation, storage, handling, treatment, transportation, and ***disposal*** of hazardous ***wastes*** from Con Edison facilities and field locations.

2.0 APPLICABILITY

These procedures apply to all Con Edison facilities that generate, store, handle, treat, transport, or dispose of hazardous waste. These requirements apply to hazardous wastes, i.e., materials that have no useful purpose for Con Edison and must be disposed of. Furthermore, these requirements do not apply to nonhazardous wastes, such as used oil. Management of nonhazardous waste is discussed in Corporate Environmental Procedure (CEP) 5.0, "Solid Waste Management".

3.0 INTRODUCTION

To ensure that hazardous waste is properly managed, the United States Congress passed the Resource Conservation and Recovery Act (RCRA). In New York, the New York State Department of Environmental Conservation (NYSDEC) administers RCRA; NYSDEC also treats polychlorinated biphenyl (PCB) waste as hazardous waste. RCRA provides requirements covering all aspects of hazardous waste handling, from the point where the hazardous waste is first generated to the point where the waste is disposed of. Since RCRA covers the "life" of the hazardous waste, it is often called the "cradle to grave" regulation for hazardous waste. Under RCRA regulations, hazardous waste ***generators*** are held responsible for ensuring that the waste is properly handled throughout the entire life of the waste, from safely managing the waste while it is on the generator's property, to choosing a responsible ***transporter*** to haul the waste off-site, to ensuring that the waste is safely disposed of at an appropriate ***treatment, storage, or disposal facility (TSDF).***

4.0 COMPLIANCE REQUIREMENTS

CEPs are provided for 15 subject areas related to hazardous waste management. This program overview provides a summary of the information that is presented in each CEP.

CEP 4.2 Generator Status

Three types of hazardous waste generators are defined in the environmental regulations: ***large-quantity generator (LQG), small-quantity generator (SQG),*** and ***conditionally exempt small-quantity generator (CESQG).*** Generator status is based on how

much and what type of hazardous waste, including PCB waste, is generated at a facility every month and the maximum amount stored on-site at any one time. Correctly determining a facility's generator status is important because generator status determines what hazardous waste generator regulations apply to the facility. This CEP discusses how to determine the physical boundary of a generator facility; how to determine and document generator status; and how generator status relates to hazardous waste regulatory requirements.

CEP 4.3
Waste Characterization

Potential hazardous waste materials must be evaluated to determine whether they are classified as hazardous waste as defined in the environmental regulations. This procedure is known as a ***hazardous waste determination***. Determining the proper classification of the waste will also help to determine the proper handling and disposal method for the waste. This CEP reviews the hazardous waste determination process; the different types of hazardous wastes; sampling and analysis of waste; and recordkeeping requirements.

CEP 4.4
Accumulation

Hazardous wastes may be accumulated at generator facilities in accordance with specific time and/or volume limits. The applicable time and/or volume limits depend on the generator status of the facility. LQGs must comply with a time limit, SQGs must comply with time and volume limits, and CESQGs must comply with a volume limit. If these limits are exceeded, then the generator status of the facility changes, and more stringent regulations will apply. The facility or site manager responsible for compliance must ensure that no time and/or volume limits are exceeded. This CEP reviews the types of waste accumulation and storage areas that can exist at a generator facility, and the time and volume limits for waste storage according to each generator status. PCB wastes have different accumulation and storage requirements, which are discussed in CEP 6.7, "PCB Management", Section: *Waste Storage*.

CEP 4.5
Labeling

Environmental regulations include special labeling requirements for hazardous wastes while they are accumulated and stored on-site prior to disposal. In general, all hazardous waste ***containers*** must be clearly labeled with the words "Hazardous Waste", with words that identify the contents of the container, and with the ***accumulation start date***. The United States Department of Transportation (USDOT) requires additional labeling when waste containers are shipped off-site (i.e., the yellow hazardous waste label and the hazard class label). The facility or site manager responsible for compliance must ensure that all hazardous waste containers are properly labeled. This CEP describes the labeling requirements for waste during accumulation and storage, pending laboratory analysis, and for off-site shipment.

CEP 4.6 Storage

While hazardous wastes are generated, they may be placed in containers in an area located at or near the point of generation known as a ***satellite accumulation area***. When 55 gallons of hazardous waste is accumulated in a satellite accumulation area, the waste must be transferred to a ***central storage area*** *or shipped off-site within three days*. Special storage requirements exist for each type of storage area. Additional requirements also exist for facilities in Brooklyn and Queens that store liquid hazardous waste. This CEP describes these two types of storage areas, provides the specific requirements for storage in each of these areas, and discusses the additional requirements for liquid hazardous waste storage in Brooklyn and Queens. PCB wastes have additional storage requirements, which are discussed in CEP 6.7, "PCB Management", Section: *Waste Storage*.

CEP 4.7 Drum Management

Drums that are approved by the USDOT must be used for storage, transportation, and disposal of hazardous waste. Drums containing waste must not be opened, handled, or stored in a manner that may cause them to leak. Management requirements for empty drums must also be followed for containers after hazardous waste or other hazardous material has been removed from the containers. This CEP provides a list of drums that may be used for hazardous waste storage, on-site drum management requirements, and empty drum management and disposal practices.

CEP 4.8 Inspections

LQGs and SQGs are required to conduct weekly inspections of their central storage areas to confirm that the waste is properly stored. The condition of each individual container, the secondary containment within the storage area, and any posted signs must be inspected, and each inspection must be documented on a ***weekly inspection log*** to demonstrate compliance. This CEP describes how to perform a weekly inspection, what should be done if problems are discovered, and what documentation should be maintained on file.

CEP 4.9 Manifests and LDR Forms

Before hazardous waste can be shipped from a Con Edison facility or field location for off-site disposal, a hazardous waste ***manifest*** and a ***land disposal restriction (LDR) form*** must be completed. The manifest is a document that accompanies the waste from the time it leaves the generator's facility until it reaches its final destination. The manifest requires information about the waste generator, the transporter, the disposal facility, and the waste itself. The purpose of this document is to track the waste shipment from the point of generation to the final destination (i.e., cradle to grave).

The LDR form notifies the disposal facility that the waste is either banned from land disposal (e.g., landfilling) or certifies that the waste

already meets land disposal requirements. Land-banned waste must be pretreated prior to land disposal (e.g., landfilling).

When waste reaches its final destination, a disposal facility representative is required to sign the manifest and return one copy of the manifest to the generator. This is documentation that the waste arrived at the proper facility. All copies of manifests and LDR forms must be maintained in a file at the facility or a central location, and copies of manifests must be sent to the regulatory agencies of the generator and disposal facility states. This CEP discusses the regulatory requirements for manifests and LDR forms, how to complete and distribute a manifest, required training on how to complete a manifest, and recordkeeping requirements.

CEP 4.10
Transportation

Hazardous waste that is shipped off-site over public roadways for disposal must be transported by a permitted waste transporter and must be accompanied by a hazardous waste manifest and LDR form. The vehicle transporting the waste must also be equipped with the proper placards. Hazardous waste must be transported directly from a generator's facility to a permitted TSDF by a permitted hazardous waste transporter. This CEP describes the regulatory requirements for transportation of hazardous waste, and discusses what procedure generators must follow to ensure safe transportation of waste. The regulations include a special exemption known as the ***"One Trip Rule",*** which allows public utilities to transport ***PCB hazardous waste*** from remote field locations without a manifest. See CEP 6.10, "PCB Management", Section: *Transportation* for more information.

CEP 4.11
Disposal

All facilities that generate hazardous waste must ensure that the waste is properly shipped to a TSDF for disposal. The generator must ensure that the transporter and TSDF have each received a United States Environmental Protection Agency ***(USEPA) Identification (ID) Number***, and that the TSDF possesses the proper permits and equipment to handle the waste. The generator is responsible for the waste from cradle to grave. This CEP discusses how to obtain approval for disposal of hazardous waste at a TSDF and how to dispose of "universal wastes".

CEP 4.12
Contingency Plan and Emergency Procedures

A hazardous waste ***contingency plan*** is a written plan that documents the actions that must be taken at a facility to reduce hazards to human health and the environment. Hazards may be caused by unplanned releases, explosions, or fires involving hazardous wastes. The plan also identifies roles and responsibilities of Con Edison personnel and local emergency response personnel during a hazardous waste emergency. The plan must be implemented immediately upon any fire, release, or explosion that has the potential for causing environmental harm or adverse effects

on human health. LQGs are required to prepare a written plan. SQGs are not required to prepare a written plan, but they are required to follow specific guidelines. This CEP discusses the contents of a hazardous waste contingency plan, implementation of emergency procedures, reporting of emergency incidents, and preparedness and prevention.

CEP 4.13 Closure Plans

LQG facilities located in Brooklyn and Queens are required to prepare a ***closure plan*** that identifies the specific procedures that the facility will follow prior to closing a hazardous waste central storage area. The plan must describe off-site disposal of remaining wastes, decontamination of the storage area, and the closure schedule. This CEP discusses the required contents of the plan, NYSDEC notification requirements, the time allowed for closure, and certification of closure. The generic Con Edison closure plan is provided.

CEP 4.14 Personnel Training

LQGs of hazardous waste must provide training to every employee who handles or manages hazardous waste from the time it is generated to when it is shipped off-site for disposal. The training must be conducted every 12 months, and must consist of a program of classroom instruction at The Learning Center and/or on-the-job training. The training must teach employees how to perform their jobs so that the facility maintains compliance with environmental regulations and can effectively respond to emergency situations. SQGs must also ensure that employees are thoroughly familiar with proper waste handling and emergency procedures. Training is also required for personnel who prepare/sign manifests and LDR forms. This CEP describes the topics that the training program must include, the training requirements for new and current employees, and recordkeeping requirements.

CEP 4.15 Waste Minimization

Waste minimization is defined as any reduction or recycling activity that reduces the volume and/or toxicity of a hazardous waste destined for disposal. Benefits of waste minimization include reduction of raw material and disposal costs, reduction of fees paid to NYSDEC, reduced liability claims, and enhancement of public image. All hazardous waste generators are required to reduce the volume and toxicity of their waste. Any facility that generates greater than or equal to 25 tons of hazardous waste per year is also required to prepare and submit to NYSDEC a ***Hazardous Waste Reduction Plan (HWRP).*** This CEP describes the aspects of a waste minimization program, and discusses what information is required in the HWRP.

CEP 4.16 Reporting and Recordkeeping

Environmental regulations require that specific reports be submitted to federal, state, and local regulatory agencies. In addition, specific

documents and papers must be maintained in a file at the generator's facility or central location to document that hazardous wastes are properly managed. These records must be shown upon request to any federal, state, or local inspector, officer, employee, or representative. This CEP describes all reports that are required to be submitted to regulatory agencies and all records that are required to be maintained at the facility or central location.

5.0 DEFINITIONS

Accumulation Start Date: If the waste is initially accumulated in a satellite accumulation area the accumulation start date is when 55 gallons of hazardous waste are accumulated in the satellite accumulation area or the date the container(s) is moved to the central storage area. If a container is initially filled in a central storage area, the accumulation start date is the date on which hazardous waste is first placed in the container.

Central Storage Area: The area where wastes are usually stored prior to being shipped off-site for disposal.

Characteristic Waste: A waste that is a hazardous waste because it exhibits at least one of the following properties:

- ***Ignitable***: A liquid waste having a flash point less than 140° Fahrenheit (60° Centigrade); a solid that, through friction, absorption of moisture, or spontaneous chemical change, burns vigorously when ignited; an ignitable compressed gas; or any material that is classified as an oxidizer. Ignitable wastes are designated by the waste code D001.

- ***Corrosive***: An aqueous waste with a pH equal to or less than 2 (known as an acid waste) or a pH greater than or equal to 12.5 (known as a base, alkaline, or caustic waste). Corrosive wastes are designated by the waste code D002. Solid material which does not contain free liquid by paint filter test or visual observation is not an aqueous waste and therefore not hazardous for the characteristic of corrosivity.

- ***Reactive***: A waste that reacts violently with water, exhibits explosive characteristics, or contains cyanide or sulfide and can form toxic gas. Reactive wastes are designated by the waste code D003.

- ***Toxic***: A waste that fails a laboratory procedure known as the Toxicity Characteristic Leaching Procedure (TCLP). The procedure tests for the concentrations of 40 specific chemical compounds and metals under certain conditions. If the concentration of any chemical compound or metal is greater than

the allowable level specified by USEPA and NYSDEC, then the waste is a hazardous waste. Toxic wastes are designated by waste codes D004 through D043.

Closure Plan: A document that identifies the specific procedures that a facility must follow prior to closure of all or part of its central hazardous waste storage area or the part of the facility that is used to store or treat hazardous waste.

Conditionally Exempt Small-Quantity Generator (CESQG): Any facility that generates less than or equal to 220 pounds (100 kilograms) of hazardous waste per calendar month and does not accumulate more than 2,200 pounds (1,000 kilograms) of hazardous waste at any one time.

Container: Any portable device in that a material is stored, transported, treated, disposed of, or otherwise handled. Containers include pails, buckets, drums, boxes, bags, totes, and rolloff containers.

Contingency Plan: A document that specifies an organized, planned, and coordinated course of action to be followed in the event of an emergency.

Destination Facility: A facility that treats, disposes of, or recycles a particular category of universal waste.

Disposal: The abandonment, discharge, deposit, injection, dumping, spilling, leaking, or placing of any kind of solid or hazardous waste into or on any land or water so that such waste or any constituent thereof may enter the environment. In addition, disposal refers to the thermal destruction of wastes and the burning of such wastes as fuel for the purpose of recovering usable energy.

Emergency Coordinator ("White Hat"): The Con Edison employee present at an emergency response scene who is responsible for directing emergency response activities. The "White Hat" is the direct link between Con Edison and outside regulatory agencies who may be on-site assisting with the emergency response. The "White Hat" is the only person at the facility wearing a white hard hat.

Exception Report: A report that a generator must send to NYSDEC if a signed manifest copy has not been received by the generator within 45 days of shipping the waste to an off-site disposal facility.

Generator: Any person whose act or process produces hazardous waste.

Hazardous Waste: Any waste that poses a present or potential threat to human health, living organisms, or the environment. There are two types of hazardous wastes: ***listed wastes*** and ***characteristic wastes*** (see definitions for each type of waste).

Hazardous Waste Determination: The procedure that is used to determine whether a solid waste is a hazardous waste. The determination can be made either through knowledge of the waste or the process generating the waste, or through sampling and laboratory analysis of the waste.

Hazardous Waste Reduction Plan (HWRP): A written plan that must be prepared and implemented by any LQG that generates greater than or equal to 25 tons of hazardous waste per year. The plan describes on-site waste minimization techniques and tracks the effectiveness of waste minimization efforts.

Incident Report: A report that a large-quantity generator must submit to NYSDEC within 15 days whenever the facility's contingency plan is implemented in response to an emergency situation, such as a spill, fire, or explosion.

Incompatible Waste: A hazardous waste that is unsuitable for placement into a container due to its ability to cause corrosion of the container, or due to mixing with another material that may produce an adverse reaction.

Land Disposal Restriction (LDR) Form: A form prepared by the hazardous waste generator that notifies the disposal facility that the waste is either banned from land disposal (e.g., landfilling) or certifies that the waste already meets land disposal requirements.

Large-Quantity Generator (LQG): Any facility that generates greater than or equal to 2,200 pounds (1,000 kilograms) of hazardous waste per calendar month.

Large-Quantity Handler of Universal Waste (LQHUW): A universal waste handler that accumulates 5,000 kilograms or more of total universal waste at any time.

Listed Waste: A waste that appears in any one of five lists of specific chemicals and chemical mixtures that has been identified by USEPA and NYSDEC as hazardous wastes. The five types of listed wastes are F wastes, K wastes, P wastes, U wastes, and B wastes. P wastes, which are poisons such as cyanides, are also known as "acute" hazardous wastes. Listed wastes that Con Edison facilities will most likely generate are B002 through B007 wastes, which are

wastes containing 50 ppm or more of PCBs, and F003 and F005 wastes, which are specific spent solvent wastes.

Manifest: The document that travels with the waste from the generator's facility to the disposal facility and acts as a record of all people who come into contact with the waste. The manifest contains information on the generator, the transporter, the disposal facility, and the waste itself.

Material Safety Data Sheet (MSDS): An information packet prepared by a chemical manufacturer that lists specific information on a chemical product, such as physical properties, chemical composition, degree of hazard, and emergency response information.

One-Inch Rule: The method to determine whether a container can be considered empty. In order for a container to be empty, no more than 1 inch of residue can remain in the bottom of the container.

One Trip Rule: An exemption for public utilities that allows the first trip for transporting PCB waste from a remote field location or remote spill site to a temporary storage location or the Astoria PCB Storage Facility to be exempt from manifesting requirements. However, any subsequent trips from the temporary storage location or Astoria PCB Storage Facility must use a manifest.

Overpack: A sturdy container that a smaller container can be placed into. Overpacks, also commonly known as salvage or recovery drums, are used as a type of secondary containment for smaller containers that are damaged or leaking. The most popular sizes of overpacks are 85 and 95 gallons, which can be used to overpack any container up to 55 gallons in size.

PCB Hazardous Waste: Any hazardous waste with a PCB concentration of 50 parts per million or greater.

Satellite Accumulation Area: The hazardous waste accumulation area located at or near the point where hazardous waste is initially generated. The area must be under the control of the person generating the waste. Less than 55 gallons of hazardous waste or 1 quart of acute hazardous waste may be stored in a satellite accumulation area for any length of time. Once the allowable storage limit has been exceeded, the waste must be moved to a central storage area or shipped off-site for disposal within 3 days.

Small-Quantity Generator (SQG): Any facility that generates greater than 220 pounds (100 kilograms) but less than 2,200 pounds (1,000 kilograms) of hazardous waste per calendar month. In

addition, the facility must not accumulate more than 13,200 pounds (6,000 kilograms) of hazardous waste at any one time.

Small-Quantity Handler of Universal Waste (SQHUW): A universal waste handler that accumulates less than 5,000 kilograms of total universal waste at any time.

Transporter: A person who is engaged in the transportation of hazardous waste by air, rail, highway, or water.

Treatment, Storage, or Disposal Facility (TSDF): A facility that accepts hazardous waste from generators and is permitted by USEPA and NYSDEC or other state's environmental agency to treat hazardous waste, store hazardous waste for more than 90 days, and dispose of hazardous waste.

Universal Waste Handler: A generator of universal waste or a facility that receives universal waste from other universal waste handlers, that accumulates universal waste, and that sends universal waste to another universal waste handler or to a destination facility.

USEPA Identification (ID) Number: The facility-specific number assigned by USEPA to each hazardous waste generator, transporter, and TSDF.

Waste Code (Hazardous Waste Number): The alphanumeric code developed by USEPA and NYSDEC that is assigned to each type of hazardous waste. For example, D001 is the waste code for an ignitable waste.

Waste Minimization: Any reduction or recycling activity that reduces the volume and/or toxicity of a hazardous waste destined for disposal.

Weekly Inspection Log: A means of documenting that a facility has performed weekly inspections of its central hazardous waste storage area. Information about the area, the secondary containment, and the containers in the area is recorded on the log.

6.0 RESPONSIBILITIES

Central Information Group (CIG): The CIG is responsible for emergency spill notification and reporting to federal, state, and local agencies, and for maintaining records of spill notifications and reports.

Environment, Health, and Safety (EH&S): EH&S shall coordinate the preparation and submission of applications, certifications, registrations, permits, plans, and lists in conjunction with Section 4.0, Compliance Requirements. In addition, EH&S is responsible, along with The Learning Center and Operating Departments, for developing

and conducting training courses to meet EH&S needs. EH&S is also responsible for performing the following functions:

- Provide expert support from EH&S specialists.
- Ensure the proper remediation of spills, releases, and other EH&S incidents resulting from Con Edison operations.
- Coordinate waste removal contracts, and waste management and pollution prevention programs.
- Interpret and notify line organizations and Public Affairs about EH&S rules, regulations, decisions, orders, and violations.
- With Corporate Auditing, monitor compliance with EH&S regulations.
- Evaluate engineering and construction projects that potentially impact the environment and/or worker safety and health.
- Develop and direct Company-wide programs to improve and maintain workplace safety.
- Provide assistance and give guidance to safety administrators in implementing industrial hygiene and safety programs.
- Review Material Safety Data Sheets for approval of new chemicals, and identify personal protective equipment and control measures for the safe use of these materials.

Environment, Health, and Safety (EH&S), Director, Program Management: The Director, Program Management within EH&S shall perform the following functions in conjunction with Section 4.0, Compliance Requirements:

- Monitor rules and regulations.
- Revise CEPs with the approval of the CEP Review Committee.
- Review documents prior to release.
- Distribute updates and changes.

Environment, Health, and Safety EAR: The EH&S representative assigned to each operating department will provide guidance and assistance in environmental regulatory programs to the facility or site manager responsible for compliance. The EH&S representative will be consulted by the operating departments in order to interpret unexpected EH&S data or events.

Environment, Health, and Safety (EH&S), Vice President: The Vice President within EH&S shall approve controlled documents prior to release.

Facility or Site Manager Responsible for Compliance: The Con Edison designated individual within each operating department is responsible for ensuring compliance with federal, state, and local regulations.

Law Department: The Law Department shall ensure that changes to the CEPs required by changes to laws and regulations are made and issued to the EH&S Director, Program Management.

Operating Departments: Unless otherwise indicated, operating departments (Customer Service, Electric, Fossil, Gas, Transportation and Stores, Steam, and Systems & Transmission Operation [S&TO]) shall perform the functions listed in Section 4.0, Compliance Requirements.

The Learning Center: The Learning Center is responsible for conducting classroom training courses in Con Edison policies and procedures and environmental, health, and safety laws and regulations.

7.0 REFERENCES

Federal:

Resource Conservation and Recovery Act, 42 U.S.C. § 6921 *et seq.*

Title 40, Code of Federal Regulations, Part 262 - Standards Applicable to Generators of Hazardous Waste.

New York State:

Environmental Conservation Law, § 27-0305 - Waste Transporter Permits.

Environmental Conservation Law, § 27-0900 *et seq.* - Industrial Hazardous Waste Management.

Environmental Conservation Law, § 71-2727 - Enforcement of Articles 27 and 71.

Title 6, New York Code of Rules and Regulations, Part 372.2 - Standards Applicable to Generators of Hazardous Waste.

Con Edison:

Safety Practices

S-009 - Identification and Maintenance of Field Instruments for Atmospheric Testing.

S-027 - Personal Eye and Face Protective Equipment.

S-102 - Industrial Hygiene and Safety Services Responsibilities During an Emergency.

Industrial Hygiene Practices

IH-002 - Procedure for Reporting Employee Claims of Exposure to Substances.

IH-005 - Personal Protection and Safe Handling of PCB Fluids and Materials.

IH-006 - Procedure for Cleaning PCB Contamination From the External Surface of Electrical Cables.

IH-007 - Respiratory Protection Program.

IH-009 - Airline Respirators and SCBA Procedure for Gas Operations.

CORPORATE ENVIRONMENTAL PROCEDURE

RELEASE REPORTING

CEP 10.01 – Release Reporting

Revision #3 – 05/01/2001

1.0 PURPOSE

It is Con Edison's policy to comply with all federal, state, and local laws, regulations and regulatory agreements pertaining to immediate and follow up reporting of environmental ***spills*** or ***releases*** of ***petroleum products*** and ***hazardous substances.*** All required agency notifications for releases of petroleum products and hazardous substances are made by the Con Edison Central Information Group (CIG), with the exception of notifications for releases of radioactive materials from Indian Point 2. When CIG is notified of a spill or release of a petroleum product or hazardous substance, the Con Edison Environmental Response Team Members (ERTs) advise CIG on what agency notifications, if any, are required.

The ability of CIG and the ERTs to fulfill Con Edison's release reporting obligations depends on their receipt of prompt, accurate and complete information on spills or releases occurring at Con Edison ***facilities*** and ***remote locations,*** or on ***third-party property***. This CEP 10.01 describes the procedures that Con Edison personnel must follow to provide CIG and the ERTs with the information necessary to complete required immediate and follow up release reporting. Attachment 1 to this CEP 10.01 contains a flow chart summarizing the reporting obligations for petroleum spills or releases in underground structures. Attachment 2 contains a flow chart summarizing the reporting obligations for petroleum spills or releases other than in underground structures. Attachment 3 contains a flow chart summarizing the reporting obligations for releases of hazardous substances. Attachment 4 contains matrices identifying certain spill or release events that must be recorded in Con Edison's e^2MIS system, and indicating whether those events must also be reported to CIG. Attachment 5 contains a table of chemicals commonly used by Con Edison, together with ***reportable quantities ("RQs")*** for those substances. Attachment 6 contains Con Edison's spill and release reporting policy.

2.0 APPLICABILITY

These procedures apply to all Con Edison facilities, remote locations and third-party property where Con Edison personnel store, handle, use, transport, or transfer petroleum products or hazardous substances.

In addition to the descriptions of reporting obligations in this CEP, various aspects of spill or reporting are addressed in other CEPs dealing with specific media or substances.

3.0 INTRODUCTION

Regulations governing reporting of environmental spills or releases of petroleum products and hazardous substances were enacted to provide regulatory agencies with the information they need to respond to spills or releases, or to monitor responses by private parties. These regulations may impose an obligation to immediately report spills or releases by telephone, to

send the agency a written follow up report respecting the spill or release, or to provide both an immediate telephone report and a written follow up report.

To ensure compliance with its reporting and related obligations, Con Edison has established a centralized reporting procedure. When Con Edison personnel learn of a spill or release, their principal reporting obligations are to immediately provide relevant information to CIG, if required, to record the spill or release in e²MIS, and to update e²MIS promptly when new information on the spill or release becomes available. CIG provides information on the spill or release to the ERTs, who identify any required agency notifications. CIG then completes any agency notifications identified by the ERTs.

CIG and the ERTs depend on all involved Con Edison personnel to provide them with prompt, accurate and complete information on environmental spills or releases. This CEP describes the procedures by which Con Edison personnel provide required information to CIG both for immediate oral agency notifications, and for written follow up reports, where these are required.

4.0 COMPLIANCE REQUIREMENTS

Section 4.1 below explains the processes and requirements for providing spill or release information to CIG. Section 4.2 describes the requirement to immediately update CIG in the case of changed spill or release-related circumstances. Section 4.3 describes facility requirements to document spills and releases in e²MIS, and to update this documentation as new information becomes available. Section 4.4 explains the processes and requirements for providing follow up information to appropriate EH&S personnel, so that any required written follow up reports can be completed.

4.1 IMMEDIATE INTERNAL REPORTING REQUIREMENTS

As soon as a Con Edison employee learns about either a petroleum or hazardous substance spill or release, the employee must IMMEDIATELY provide information about the spill or release to appropriate Con Edison personnel. An employee who discovers a spill or release must immediately notify the appropriate Control Center, his/her immediate supervisor, and/or the shift supervisor. Agency notification may be required in as little as 30 minutes after discovery of the spill or release. To accomplish this, all Con Edison personnel must fulfill their obligations under this CEP promptly.

The discovery that petroleum or a hazardous substance has been spilled or released **ALWAYS** triggers a requirement to enter information about the spill or release into e²MIS. Additional details on completing e²MIS spill or release documentation are contained in Section 4.3. Often, but not always, information about the spill or release must also be provided by telephone to CIG.

Depending on which organization the person who discovered the spill or release is from, either the Control Center, the immediate supervisor, and/or the shift supervisor will enter appropriate information into e²MIS and/or notify CIG, if required. CIG, after consultation with the ERTs, will make any required immediate agency notifications. CIG can be reached at 1-212-684-2030 during environmental emergencies (e.g., oil release to waterway, storm drain or sewer, spill of 1,000 gallons or more from inter-facility pipeline, the receipt of data or sampling results that appear ambiguous or suspect., etc.) and at 1-800-246-8CIG at all other times.

Attachment 4 to this CEP 10.01 contains a matrix showing whether certain spill or release events trigger an obligation for the organization discovering the spill or release to immediately notify CIG. While attempts have been made to make this matrix as complete as possible, no matrix can foresee every set of circumstances that might arise at a Con Edison facility. Judgment must be used with respect to situations not addressed in Attachment 4. In case of any doubt, contact CIG, which will consult with the ERTs for guidance.

The following information respecting spills or releases must be provided to CIG if and when available, and as soon as it becomes available:

- The name, control number, job title, phone number and department of the person who discovered the spill or release.
- The date and time the spill or release was discovered.
- The location of the spill or release, including whether a Con Edison structure or vehicle is involved.
- The identity of the spilled or released material, including concentrations of all hazardous chemicals in a mixture, if known (*e.g.*, 50% sodium hydroxide in caustic soda).
- The amount and, if the spill or release is continuing, rate of the spill or release. Also, the amount of water present with the spill or release, if applicable.
- The area, structures, vehicles, persons, and materials affected by the spill or release.
- Whether the spill or release affects vegetable gardens or grazing lands.
- The source and cause of the spill or release, including if a smoke/fire condition is present.
- Whether the spill or release has been ***contained/controlled*** and, if so, how.
- Whether the spill or release has entered a waterway (and, if so, the name of the waterway) or sewer, and what physical evidence is present to confirm that the spill or release entered a sewer or waterway.
- If the spill or release is in an underground structure, whether the structure contains an unplugged sewer connection, a trap into which substances have entered, a running sump pump, or an earthen bottom, whether there are substantial cracks in the structure's walls or floor, whether oil is seeping in from the walls, conduits or floor, etc.
- Whether there have been injuries or property damage.
- Whether evacuation is required and, if so, of what area.
- Whether government or media representatives have been contacted and/or are present.
- Whether Company or contractor support is needed.
- The status of the cleanup.
- Whether climate conditions are contributing or contributed to the hazards caused by the spill or release.
- Whether the spill or release was or may have been caused by a third party, and, if so, the name of the third party, if known.

Also, Con Edison handles a variety of materials that may contain PCBs. Con Edison employees reporting spills or releases must provide CIG with all available information on the PCB concentration of the spilled or released materials, if any. In certain circumstances, spills or releases of ***PCB wastes***, including wastes with an actual PCB concentration < 50 ppm, must be reported to environmental agencies. CIG must be notified of **ALL** spills or releases of waste from a PCB tanker, PCB waste drum, PCB waste tank or PCB waste equipment unless the spilled or released material is **KNOWN** to contain < 2 ppm PCBs in oil or < 0.5 micrograms per liter PCBs in water (the PCB decontamination standards for oil and water, respectively: *see* CEP 6.14). The ERTs, who receive regular update training on PCB reporting rules, will determine whether the government must be notified of these spills or releases.

CIG may request information different from or in addition to that described above. All Con Edison personnel have a responsibility to assist CIG in obtaining all of the information it needs to make timely and accurate agency reports.

4.2 CONTACTING CIG TO REPORT CHANGED SPILL OR RELEASE CIRCUMSTANCES

If a spill or release was not originally reportable to CIG, but the conditions change to make the spill or release reportable, the operating organization must notify CIG as soon as possible to update the information. Likewise, if the conditions for a reported spill or release change significantly after the initial report, the operating organization must notify CIG to update the information.

Examples of changed conditions that would require updating CIG include:

- The threshold of an RQ is exceeded. (A matrix containing RQs for materials commonly used at Con Edison is contained in Attachment 5 to this CEP 10.01.)
- The amount spilled or released is significantly different from what was originally reported.
- Analytical results indicate a difference in the PCB concentration range (< 50 ppm, 50 to 499 ppm, or ≥ 500 ppm), or another significant change in PCB concentrations (*e.g.*, from 500 to 5,000 ppm PCBs) from what was originally reported.
- If a PCB concentration was not initially reported (*e.g.*, the concentration was unknown), any subsequent analytical PCB results.
- A different impact to the environment occurred than was originally reported (for example, subsequent knowledge that a spill or release reached a sewer or a waterway).
- A spill or release initially believed to be *de minimis* will not meet the *de minimis* criteria (*e.g.*, ≥ 5 gallons; not contained or controlled; spill or release is in underground structure that is found to have an unplugged sewer connection, earth bottom or oil seeping in through walls, floor or conduits; leaks from Con Edison equipment in underground structure cannot be controlled within 24 hours; or spill not cleaned up in 2 hours (for aboveground spill) or in 24 hours (for spill or release in underground structure)).

In addition to notifying CIG of the change in the spill or release status, the operating organization is also responsible for accessing the original e²MIS report and updating the relevant data fields.

4.3 DOCUMENTATION OF PETROLEUM PRODUCT AND HAZARDOUS SUBSTANCE SPILLS AND RELEASES

When any spill or release event occurs, the facility or site manager responsible for compliance (or his/her designee) must enter required information regarding the event into e²MIS. e²MIS reports must be made available in a timely manner upon request during routine NYSDEC inspections or during spill or release events. The e²MIS system assigns a unique Incident Number that must be used to identify the spill or release. Details regarding distribution of e2MIS reports are contained in CEP 12.01 - Documentation of Spill Cleanups.doc.

PLEASE NOTE: e²MIS may have to be updated as a spill or release response progresses, even if the basic information about a spill or release has not changed. CEP 12.01 describes Con Edison personnel's responsibilities to promptly update e²MIS until a spill or release has been finally resolved.

In addition, **WHENEVER** a facility or a Con Edison employee receives an agency enforcement document (*e.g.*, a Commissioner's Order, Notice of Violation ("NOV"), etc.) from any governmental agency at the scene of a petroleum or hazardous substance spill or release, information on the enforcement document must be entered into e²MIS. A copy of the enforcement document also must be forwarded to the Con Edison Law Department. The Law Department must be informed immediately of changes in status or circumstances relating to the enforcement document, and these changes in status or circumstances must be entered into e²MIS. Changes in status or circumstances may include such things as: i) the agency contacting Con Edison for additional information on the enforcement document; ii) completion of actions required under the enforcement document (*e.g.*, remediation of spill or release, provision of records to agency, etc.); iii) withdrawal of the enforcement document by the agency; or iv) assessment of penalties or fines by the agency under the enforcement document. **EVERY** spill or release-related enforcement document issued at the scene of a spill or release event will be tracked through e²MIS and the Law Department to ensure that all required actions are taken within the required timeframe, and that all enforcement documents are closed out promptly.

Additional details of the information that must be maintained to document spill or release cleanups is provided in CEP 12.01, *Documentation of Spill Cleanups*.

4.4 INTERNAL REPORTING REQUIREMENTS FOR FOLLOW-UP REPORTS

In addition to immediate telephone notifications, many laws require that written follow-up reports concerning spills and releases be filed with regulatory agencies. These laws generally specify the required content for these follow up reports, and specify the time period within which the reports must be sent to the agency. Personnel within EH&S have been assigned responsibility for completing follow up reports.

After an initial telephone spill notification is made, Con Edison personnel involved in reporting or responding to the spill or release are responsible for accessing the original report on e²MIS to update the relevant fields with information on response activities, etc. In addition, EH&S personnel may contact the Con Edison personnel who were involved in reporting or responding to a spill or release to obtain the additional information needed for a written follow up report. This information will generally relate to circumstances arising after the initial notification, such

as whether additional materials were spilled or released after the initial event, and what measures were taken, if any, to remediate the spill or release or recover the spilled or released materials. **PLEASE NOTE:** e²MIS may have to be updated with some or all of this information. Consult CEP 12.01 for a further discussion on this requirement.

Some written follow up reports must be filed as soon as 7 days after the spill or release event. All Con Edison personnel who are contacted by EH&S for information needed for a written follow-up report have a responsibility to respond promptly with complete and accurate information.

A spill or release event may trigger requirements to collect data on the spilled or released substance, its impact on the environment or private property, or other issues. Details on the data collection requirements applicable in spill or release events are contained in CEP 12.01.

5.0 DEFINITIONS

Conditionally Exempt Small Quantity Generator (CESQG): Any facility that generates less than or equal to 220 pounds (100 kilograms) of hazardous waste per calendar month and does not accumulate greater than 2,200 pounds (1,000 kilograms) of hazardous waste at any one time.

Contain: Keep the substance within the smallest possible physical area, and prevent cross-media contamination. This may be done with drip pans, curbing, absorbents, turning off sump pumps, etc.

Control: Eliminate the source of the spill. This can be accomplished by tightening leaking valves, plugging leaks, etc.

Facility: Any Con Edison facility, manned or unmanned, including, but not limited to, generating stations and substations.

Hazardous Substance: Any substance listed in Title 40 Code of Federal Regulations, Parts 117, 302, or 355; Title 6 New York Code of Rules and Regulations, Part 597; or Title 15, Rules of the City of New York, Chapter 11. Rather than list hazardous substances, some laws define hazardous substances as all substances having certain characteristics, such as flammability, corrosivity, toxicity, etc. These substances also fall under the definition of "hazardous substances" for purposes of this CEP.

PCB Wastes: PCB Waste: Unless exempted under USEPA's PCB regulation, any waste that contains $\geq$ 50 ppm PCBs, **OR** contains < 50 ppm PCBs but was contaminated or mixed with material that contains or, under applicable regulations, must be assumed to contain $\geq$ 50 ppm PCBs. Thus, PCB wastes include spills of waste from a PCB tanker, PCB waste drum, PCB waste tank or PCB waste equipment unless the spill is **KNOWN** to contain < 2 ppm PCBs in oil or < 0.5 micrograms per liter PCBs in water (the decontamination standards for oil and water, respectively: *see* CEP 6.14 - Decontamination Standards and Procedures.doc).

PCB waste is either ***hazardous*** or ***non-hazardous***:

Hazardous PCB Waste is waste with an actual PCB concentration, in its entirety, of ≥ 50 ppm. Also, solvents used to flush an article with ≥ 50 ppm PCBs are classified as hazardous PCB waste regardless of the PCB concentration in the used solvent.

CESQG PCB Waste: A hazardous PCB waste that is generated by a CESQG (see definition of CESQG).

Non-Hazardous PCB Waste: Waste with an actual PCB concentration, in its entirety, of < 50 ppm, or waste that is exempted from the hazardous waste regulations by NYSDEC (i.e., leaking PCB small capacitors). Hazardous PCB waste is regulated by USEPA and NYSDEC, whereas non-hazardous PCB waste is regulated only by USEPA.

Petroleum product: Petroleum or oil of any kind or in any form, including but not limited to petroleum, motor oil, motor fuel, diesel fuel, fuel oil, cable oil, dielectric or insulating fluid, hydraulic fluid, oily sludge, or oil refuse.

Release: A chemical or petroleum product spill that comes into contact with an environmental medium (*i.e.*, soil, bluestone, surface water, ambient air, etc.).

Remote Location: A Con Edison work area that is not physically located at a Con Edison facility, including manholes, pole transformers, service boxes, aerial cables, etc.

Reportable Quantity (RQ): An amount of a hazardous substance that, when released in a specified manner, must be reported to at least one regulatory agency. **A matrix containing RQs for materials commonly used at Con Edison is contained in Attachment 5 to this CEP 10.01.**

Spill: Any escape of a chemical or petroleum product from the ordinary container (e.g., tanks, drums, electrical equipment, vessels, pipelines, etc.) employed in the normal course of storage, transfer, processing, or use. To be considered a spill, the escaped material must physically leave the outer surface of the container and reach another surface or material.

Third-party property: Any property other than property owned or operated by Con Edison.

6.0 RESPONSIBILITIES

Central Information Group (CIG): The CIG is responsible for emergency notifications and reporting to federal, state, and local agencies relating to spills or releases to air, and for documenting spill notifications in e²MIS.

Environment, Health and Safety (EH&S): EH&S is responsible for completing and filing certain of the follow up reports on hazardous substance or petroleum product releases required under the laws and regulations addressed in this CEP.

Environment, Health and Safety (EH&S) Director, Program Management: The Director, Program Management within EH&S shall perform the following functions in conjunction with Section 4.0, Compliance Requirements:

- Monitor rules and regulations.

- Revise CEPs with the approval of the Environment, Health and Safety Procedures Review Committee.
- Review documents prior to release.
- Distribute updates and changes.

Environment, Health and Safety EAR: The EH&S Representative assigned to each operating department will provide guidance and assistance in environmental regulatory programs to the facility or site manager responsible for compliance. The EH&S representative will be consulted by the operating departments in order to interpret unexpected EH&S data or events.

Environment, Health and Safety (EH&S) Environmental Response Team (ERT): The ERT is responsible for providing assistance during corporate emergencies to ensure compliance with all EH&S requirements, and for assisting CIG with required notifications concerning oil spills, asbestos releases, chemical spills, safety, industrial hygiene, and other EH&S incidents. The ERTs are also responsible for filing follow up reports required under certain release reporting laws.

Environment, Health and Safety (EH&S), Vice President: The Vice President within EH&S shall approve documents prior to release.

Facility or Site Manager Responsible for Compliance: The Con Edison designated individual within each operating department is responsible for ensuring compliance with federal, state, and local regulations.

Law Department: The Law Department shall ensure that changes to the CEPs required by changes to laws and regulations are made and issued to the EH&S Director, Program Management.

Operating Departments: Unless otherwise indicated, operating departments shall perform the functions listed in Section 4.0, Compliance Requirements.

7.0 REFERENCES

Federal:

Federal Water Pollution Control Act, 33 U.S.C. 1251 *et seq.*

Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9601 *et seq.*

Emergency Planning & Community Right-To-Know Act, 42 U.S.C. 11001 *et seq.*

Hazardous Materials Transportation Act, 49 U.S.C. 5101 *et seq.*

Title 33, Code of Federal Regulations, Part 153 - Control of Pollution by Oil and Hazardous Substances, Discharge Removal.

Title 40, Code of Federal Regulations, Part 110 – Discharge of Oil.

Title 40, Code of Federal Regulations, Part 117 - Determination of Reportable Quantities for Hazardous Substances.

Title 40, Code of Federal Regulations, Part 302 - Designation, Reportable Quantities and Notification

Title 40, Code of Federal Regulations, Part 355 - Emergency Planning and Notification.

Title 40, Code of Federal Regulations, Part 761 – TSCA Spill Cleanup Policy and PCB Transformer Fires

Title 49, Code of Federal Regulations, Part 171 - General Information, Regulations, and Definitions

New York State: New York Navigation Law Sections 172, 173, 175.

New York State Environmental Conservation Law, Article 17, Sections 17-0105, 17-1743.

New York State Environmental Conservation Law, Article 37, Section 37-0103 *et seq.*

New York State Environmental Conservation Law, Article 40, Section 40-0109 *et seq.*

Title 6, New York Code of Rules and Regulations, Part 595 - Releases of Hazardous Substances.

Title 6, New York Code of Rules and Regulations, Part 596 - Hazardous Substances Bulk Storage Regulations.

Title 6, New York Code of Rules and Regulations, Part 597 - List of Hazardous Substances.

Title 6, New York Code of Rules and Regulations, Parts 612, 613 – Handling and Storage of Petroleum.

Title 17, New York Code of Rules and Regulations, Part 32 – Oil Spill Prevention and Control – Actions to be taken in Case of Discharge.

Title 17, New York Code of Rules and Regulations, Part 507– Spill Prevention and Control – Actions to be taken in Case of Discharge

New York City: Title 15, Rules of the City of New York, Chapter 11 - Hazardous Substance Emergency Response.

Title 15, Rules of the City of New York, Chapter 19 – Use of the Public Sewers

Rockland County: New York Public Health Law, Article X – Petroleum Bulk Storage.

Westchester County: Westchester County Sanitary Code, Article 22 - Water Pollution Control.

Westchester County Sanitary Code, Article 25- Petroleum Bulk Storage.

ATTACHMENTS 1-3

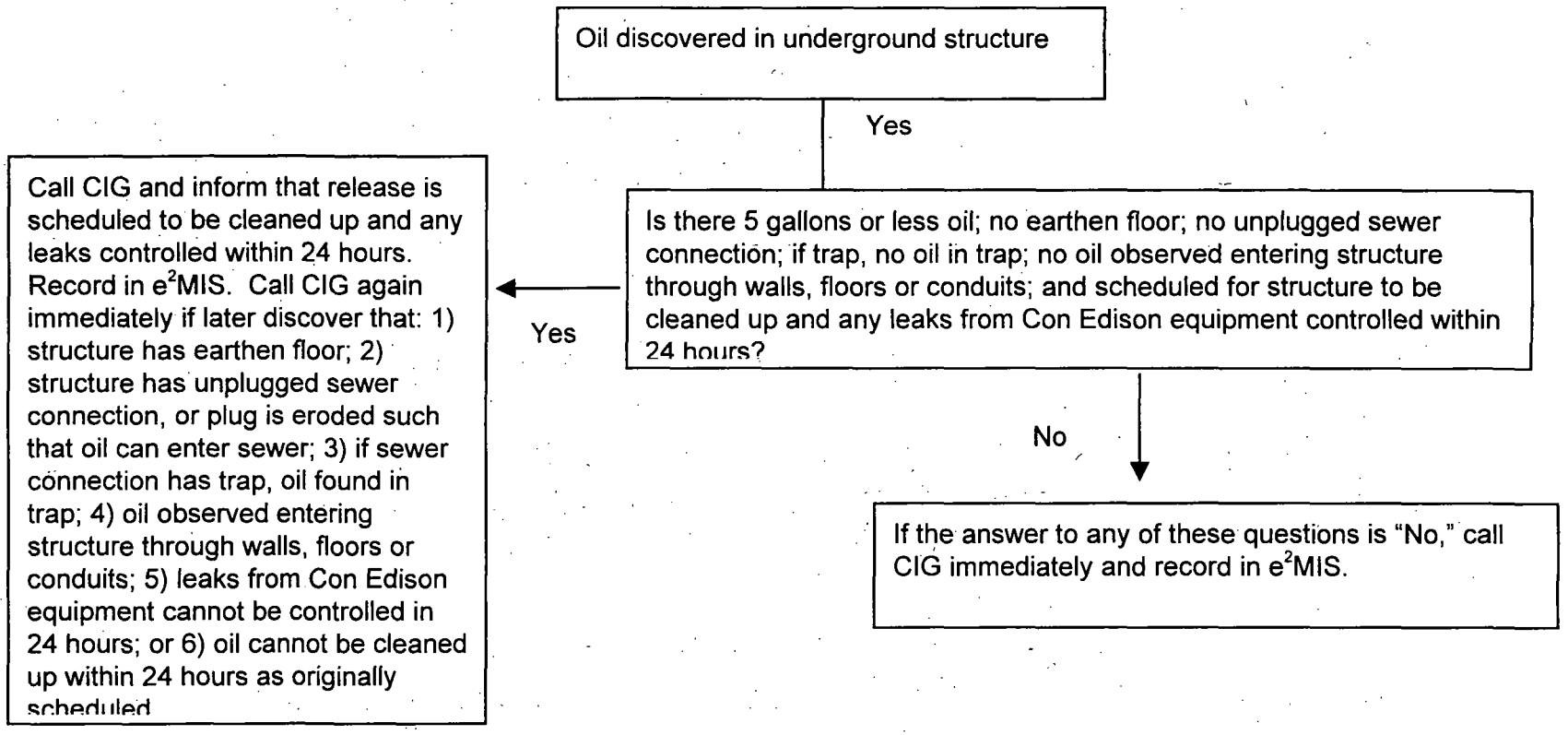
FLOW CHART SUMMARIES OF REPORTING OBLIGATIONS RELATING TO PETROLEUM PRODUCT AND HAZARDOUS SUBSTANCE RELEASES

Attachment 1 below is a flow chart that summarizes Con Edison personnel's reporting requirements for spills or releases of petroleum products in underground structures. Attachment 2 is a flow chart that summarizes reporting requirements for spills or releases of petroleum products other than in underground structures. Attachment 3 is a flow chart that summarizes reporting requirements for releases of hazardous substances.

Both attachment 3 and the appropriate attachment (1 or 2) for petroleum spills or releases may apply if petroleum containing PCBs and/or benzene is released.

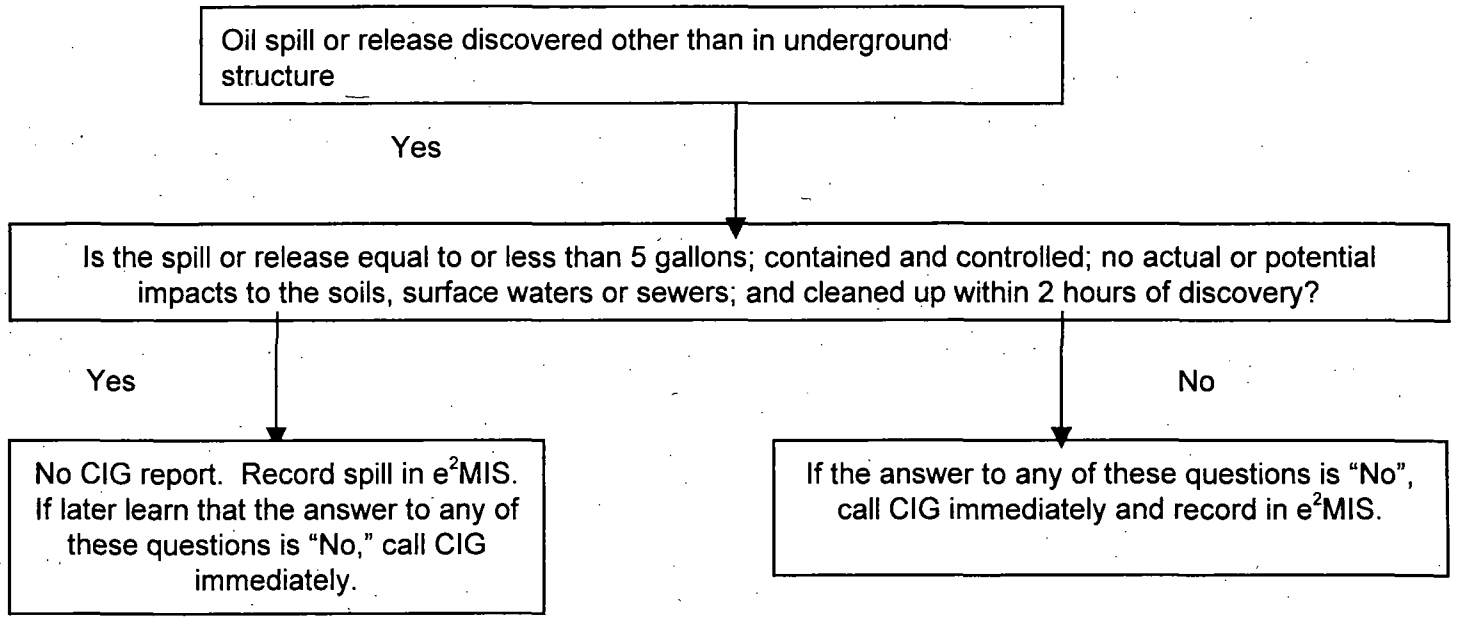
These flow diagrams are meant to complement the text of CEP 10.01 and the other Attachments to this CEP, and are not meant as a substitute for reading these other materials.

ATTACHMENT 1:
SUMMARY OF REPORTING REQUIREMENTS APPLICABLE TO OIL IN UNDERGROUND STRUCTURES*



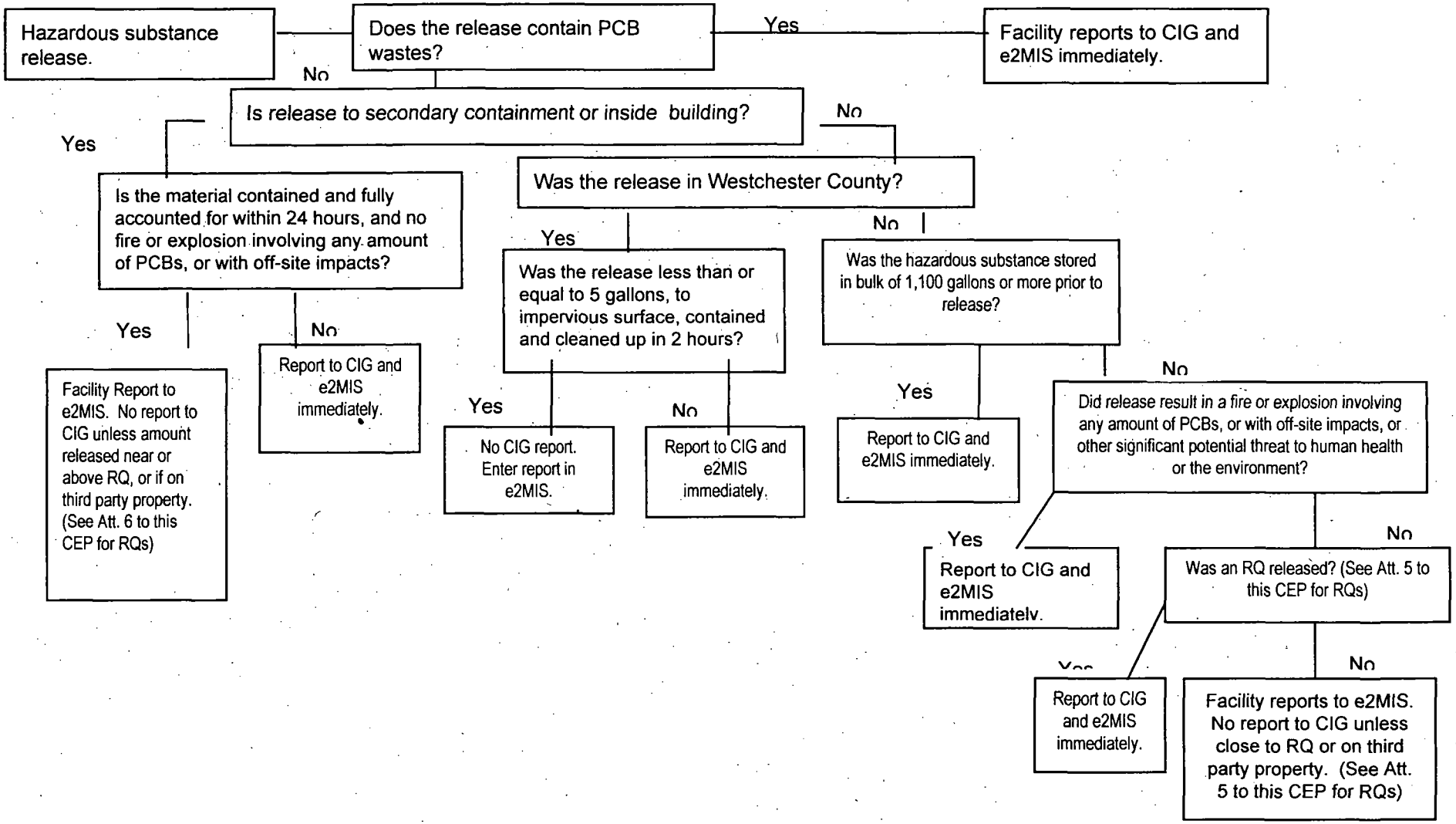
* Both attachment 3 (hazardous substance releases) and the appropriate attachment (1 or 2) for petroleum releases may apply if petroleum containing PCBs and/or benzene is released.

ATTACHMENT 2:
SUMMARY OF REPORTING REQUIREMENTS FOR OIL SPILLS OR RELEASES OTHER THAN IN UNDERGROUND STRUCTURES*



* Both attachment 3 (hazardous substance releases) and the appropriate attachment (1 or 2) for petroleum releases apply if petroleum containing PCBs and/or benzene is released.

ATTACHMENT 3:
SUMMARY OF THE HAZARDOUS SUBSTANCE RELEASE REPORTING REQUIREMENTS *



* Both attachment 3 and the appropriate attachment (1 or 2) for petroleum releases may apply if petroleum containing PCBs and/or benzene is released.

ATTACHMENT 4

INTERNAL RELEASE REPORTING MATRICES

The following three Internal Release Reporting Matrices identify spill or release events that trigger a requirement for facility notification to CIG. Matrix 1 addresses petroleum product spills or releases, Matrix 2 addresses hazardous substance releases other than asbestos releases, and Matrix 3 addresses asbestos releases.

INTERNAL REPORTING MATRIX 1:

SUMMARY OF INTERNAL SPILL OR RELEASE REPORTING REQUIREMENTS – PETROLEUM PRODUCTS** PLEASE NOTE: ALL OF THESE EVENTS MUST BE ENTERED INTO e²MIS		
Type of Incident	Quantity Released	Notify CIG?
1. Spill or release of petroleum product to impervious surface, controlled and cleaned up within 2 hours, **NOT** in underground structure, **AND NOT** at PBS facility in Rockland County.	≤ 5 gallons	No. Notify CIG if later learn any of the criteria in column 1 not met.
2. Same as Scenario 1.	> 5 gallons	Yes
3. Spill or release of petroleum product in underground structure, no apparent unplugged sewer connection or earth floor/sump, if trap to sewer connection, no oil in trap, no oil seeping in via floor/walls/conduits, **AND** scheduled to control any leaks from Con Edison equipment and complete cleanup in 24 hours.	≤ 5 gallons	Yes. Re-notify CIG if later learn any of the criteria in column 1 not met.
4. Same as Scenario 3.	>5 gallons	Yes
5. Same as Scenario 3 and later find that either unplugged sewer connection or plug has deteriorated, earth floor/sump, oil in trap, oil seeping in via floor/walls/conduits, or leaking equipment, or not cleaned up in 24 hours.	Any amount	Yes
6. Spill or release of petroleum product from PBS tank or piping in Rockland County	Any amount	Yes
7. Spill of petroleum product where liquid adheres to the equipment or is captured by a drip pan or containment bag **AND NOT** involving a	Any amount	No

** NOTE: "Petroleum products" includes dielectric fluid, transformer oil and other petroleum products.

SUMMARY OF INTERNAL SPILL OR RELEASE REPORTING REQUIREMENTS – PETROLEUM PRODUCTS** PLEASE NOTE: ALL OF THESE EVENTS MUST BE ENTERED INTO e²MIS		
Type of Incident	Quantity Released	Notify CIG?
PBS tank		
8. Spill of petroleum product where liquid adheres to PBS tanks or related piping or is from a PBS tank or related piping and is captured in a drip pan or containment bag	Any amount	Yes
9. Uncontained release to surface water, soil, bluestone, porous surface, sewer, etc., other than through SPDES outfall.	Any amount	Yes
10. Release of petroleum product from SPDES outfall.	Amount that could cause sheen	Yes

INTERNAL REPORTING MATRIX 2:

SUMMARY OF INTERNAL RELEASE REPORTING REQUIREMENTS - CHEMICALS*** PLEASE NOTE: ALL OF THESE EVENTS MUST BE ENTERED INTO e²MIS			
Type of Incident	Substance Released	Quantity Released	Notify CIG?
1. Release to impervious surface or otherwise contained (*e.g.*, moat, inside building, blacktop)	Listed liquid/solid chemical	< RQ	Only if close to RQ, to third-party property or likely to result in fire, explosion or other significant off-site impact.
2. Same as Scenario 1	Listed liquid/solid chemical	≥ RQ	Yes
3. Same as Scenario 1	Listed liquid/solid chemical at concentration < 1%	Any amount	Only if to third-party property or likely to result in fire, explosion or other significant off-site impact.
4. Same as Scenario 1	Unlisted but known liquid/solid chemical	< Gallon	Only if to non-Con Edison property or suspect particularly harmful chemical
5. Same as Scenario 1	Unlisted but known liquid/solid chemical	≥ 1 gallon	Yes
6. Same as scenario 1	Unknown liquid/solid chemical	Any amount	Only if to non-Con Edison property or suspect particularly harmful chemical, or, in facility's judgment, CIG should be notified because of large size of release, etc.
7. Uncontained release to soil, bluestone, porous surface, surface water, **BUT NOT** to sewer or through SPDES outfall.	Listed liquid/solid chemical	< RQ	Only if close to RQ, to non-Con Edison property likely to result in fire, explosion or other significant off-site impact, release is in Westchester, or chemical stored ≥ 1,100 gallon bulk prior to release.

*** NOTE: The term "listed chemical" in this Matrix refers to chemicals referenced in the RQ table in Attachment 5 to this CEP 10.1, other than asbestos. Internal reporting for asbestos releases is addressed in Internal Reporting Matrix 3 of this Attachment.

SUMMARY OF INTERNAL RELEASE REPORTING REQUIREMENTS - CHEMICALS*** PLEASE NOTE: ALL OF THESE EVENTS MUST BE ENTERED INTO e²MIS			
Type of Incident	Substance Released	Quantity Released	Notify CIG?
8. Same as Scenario 7	Listed liquid/solid chemical	≥ RQ	Yes
9. Same as Scenario 7	Unlisted or unknown liquid/solid chemical	Any amount	Yes
10. Same as Scenario 7	PCB wastes	Any amount	Yes
11. Release to sewer	Any chemical	Any amount	Yes
12. Release from SPDES permitted outfall above permit limit	Any chemical with SPDES limit	Any amount above permit limit	Yes
13. Unusual gaseous or airborne release at facility without an air permit to ambient air directly or by window or HVAC system, other than releases of < 50 lbs of HCFC-22	Any chemical	Any amount	Yes
14. Gaseous or airborne release to ambient air, either directly, through window or through HVAC system, at facility with air permit	Chemical included in the facility's air permit	Any amount above permit limit	Yes
15. Unusual gaseous or airborne release to ambient air at facility with air permit, other than releases of < 50 lbs of HCFC-22	Chemical **NOT** included in facility's air permit	Any amount	Yes
16. Releases of < 50 lbs of HCFC-22	HCFC-22	< 50 lbs	No

SUMMARY OF INTERNAL RELEASE REPORTING REQUIREMENTS - CHEMICALS[***] PLEASE NOTE: ALL OF THESE EVENTS MUST BE ENTERED INTO e²MIS			
Type of Incident	Substance Released	Quantity Released	Notify CIG?
17. Spill of chemical where liquid adheres to equipment or is captured by a drip-pan or containment bag	Any chemical	Any amount	No
18. Fires involving oil containing any amount of PCBs	PCBs	Any amount	Yes
19. Release of chemical contained on RQ Table in Attachment 5 to this CEP 10.01 for which no RQ is provided	Any chemical described in column 1	See column 4	Even if the RQ Table indicates that there is no RQ for the released substance, contact CIG if the release appears to create an unusual risk because, for example, a very large amount of the material is released, or it is released in a manner that might cause a risk of harm (*e.g.*, a large amount of a substance released to a street or waterway)

INTERNAL REPORTING MATRIX 3:

SUMMARY OF INTERNAL RELEASE REPORTING REQUIREMENTS – ASBESTOS PLEASE NOTE: ALL OF THESE EVENTS MUST BE ENTERED INTO e^2MIS		
Type of Incident	Quantity Released	Notify CIG?
1. Water main break, steam mains probably affected	N/A	Yes
2. Steam main rupture involving material reasonably believed to be asbestos	Any amount	Yes
3. Asbestos disturbed within Con Edison facility, no reason to suspect asbestos has left the building through windows, HVAC, etc.	Any amount	If reason to suspect asbestos could pose threat to human health
4. Asbestos release at Con Edison facility either directly to outside air or that leaves building through window or HVAC system	< RQ	If in close proximity to other residential, commercial or industrial facilities
5. Same as Scenario 4	$\geq$ RQ	Yes
6. Asbestos releases involving Con Edison equipment at non-Con Edison locations	Any amount	Yes

ATTACHMENT 5

REPORTABLE QUANTITIES FOR COMMONLY USED CHEMICALS/HAZARDOUS SUBSTANCES		
Chemical/Hazardous Substance Name	**Quantity of Chemical/Hazardous Substance to be Reported**	**Notes**
Acetone	0.15 gal	19 fluid ounces.
Aero-O-Foam	1.75 gal	
Aero-O-Foam XL3	1.7 gal	
Alum (Aluminum Sulfate)	0.59 cu ft	For solid, a cube approximately 10 inches each side. Equivalent weight = 100 pounds.
Aluminum Sulfate (see Alum)		
Amertrol C 354 Deposit Inhibitor	9 gal	
Ammonium Bicarbonate	—	Not reportable to regulatory agencies.
Ammonium Bifluoride	1.3 cu ft	For solid, a cube approximately 13 inches each side, or approximately 9.5 gallons. Equivalent weight = 100 pounds.
Ammonium Carbonate	1 cu ft	For solid, a cube approximately 12 inches each side, or approximately 7.5 gallons. Equivalent weight = 100 pounds.
Ammonium Hydroxide	13 gal	
Antifreeze (Ethylene Glycol)	0.13 gal	16.5 fluid ounces (See Note 1).
Asbestos (minimum 1% by weight)	0.007 cu ft (100%) 0.7 cu ft (1%)	For 100% asbestos, a cube approximately 3 inches each side. Equivalent weight = 1 pound. For 1% asbestos, a cube approximately 10.5 inches each side. Equivalent weight = 100 pounds.
Benzene (Drip Pot Liquids)	0.14 gal	18 fluid ounces.
Biosperse 261T	1.67 cf	For solid, a cube approximately 14 inches each side. Equivalent weight = 100 pounds.
Calcium Hydroxide (see Lime)		

REPORTABLE QUANTITIES FOR COMMONLY USED CHEMICALS/HAZARDOUS SUBSTANCES		
Chemical/Hazardous Substance Name	**Quantity of Chemical/Hazardous Substance to be Reported**	**Notes**
Caustic (Sodium Hydroxide) Liquid	15 gal	(50% concentration).
Chlorodifluoromethane (see Freon 22)		
Citric Acid	—	Not reportable to regulatory agencies.
Citrikleen	12 gal	
Clamtrol CT-1	0.39 gal	49 fluid ounces.
Corexit	12 gal	
D-Limonene	14 gal	
Difluorochloromethane (see Freon 22)		
Disodium Phosphate	0.8 cu ft	A cube approximately 11 inches on each side, or approximately 6 gallons. Equivalent weight = 100 pounds.
Drip Pot Liquids (see Benzene)		
EDTA (Ethylene Diamine Tetraacetic Acid)	0.02 cu ft	A cube approximately 3 inches on each side. Equivalent weight = 1 pound.
EDTA, Tetraammonium	—	Not reportable to regulatory agencies
EDTA, Tetrasodium Salt (See Amertrol C 354 Deposit Inhibitor)		
Elimin-Ox	1,164 gal	
1,2 ethanediol (See Ethylene Glycol)		
Ethanolamine	11.75 gal	
Ethylene Glycol	0.11 gal	14 fluid ounces (See Note 1)
Ferric chloride	0.55 cu ft	A cube approximately 10 inches on each side, or approximately 4 gallons. Equivalent weight = 100 pounds.
Formaldehyde Solution, 50% (1.5% Methanol)	0.2 gal	26 fluid ounces
Freon 11 (gas)	100 lb	Release to air.
Freon 11 (liquid)	1 lb	Release to land/water.

REPORTABLE QUANTITIES FOR COMMONLY USED CHEMICALS/HAZARDOUS SUBSTANCES		
Chemical/Hazardous Substance Name	**Quantity of Chemical/Hazardous Substance to be Reported**	**Notes**
Freon 12 (gas)	5,000 lb	Release to air.
Freon 12 (liquid)	100 lb	Release to land/water.
Freon 22 (Chlorodifluoromethane or Difluorochloromethane) (gas or liquid)	1 lb	(See Note 2) Release to air or land/water.
Freon 113 (gas or liquid)	1 lb	Release to air or land/water.
Freon 502 (gas or liquid)	1.95 lb	Release to air or land/water.
Gasoline	1.5 gal	
Glycol Distearate	—	Not reportable to regulatory agencies
Hazardous Waste	any quantity	
Hydrazine Hydrate	11.5 gal	
Hydrochloric Acid (28%)	10.5 gal	
Hydrofluoric Acid (50%)	20 gal	
Inhibitor A-191	—	Not reportable to regulatory agencies
Isopropyl Alcohol (100%)	15 gal	
Lead	0.01 cu ft for 100% lead	A cube approximately 2.5 inches each side. Equivalent weight = 10 pounds.
Lime (Calcium Hydroxide)	—	Not reportable to regulatory agencies.
Magnesium Oxide	—	Not reportable to regulatory agencies.
Mercury	0.01 gal	1.28 fluid ounces For NYC facilities (See Note 4).
Mineral Spirits (see Stoddard Solvent)		
Monoethanolamine	11.5 gal	
Nitric Acid	8 gal	

REPORTABLE QUANTITIES FOR COMMONLY USED CHEMICALS/HAZARDOUS SUBSTANCES		
Chemical/Hazardous Substance Name	**Quantity of Chemical/Hazardous Substance to be Reported**	**Notes**
Oil	Any spill other than a de minimis spill	De minimis spill must meet all of the following criteria: **In Underground Structure** ⇒ < 5 gallons ⇒ No sewer connection ⇒ No earth floor/sump ⇒ No oil seeping in via floor/walls/conduits ⇒ Leaks from Con Edison equipment controlled and cleanup completed in 24 hours. **Not In Underground Structure** ⇒ < 5 gallons ⇒ Contained and controlled ⇒ Cleaned up in 2 hours.
PCBs (Polychlorinated Biphenyls)	0.08 gal	10 fluid ounces (See Notes 5 and 7).
PCB Waste	Any Quantity	See Note 8.
Pentachlorophenol	0.01 cu ft	A cube approximately 2.5 inches on each side. (See Note 6) Equivalent weight = 1 pounds.
Potassium Permanganate	0.59 cu ft	A cube approximately 10 inches each side, or approximately 4.5 gallons. Equivalent weight = 100 pounds.
Propanol	14.89 gal	
Propylene Glycol	12 gal	
R-13 chlorotrifluoromethane	1 lb	Release to air or land/water.
R-115 monochloropentafluoroethane	1 lb	Release to air or land/water.
R-401A (blend R-22/124/152A)	1.89 lb	Release to air or land/water.
R-402A (blend R-22/125/290)	2.63 lb	Release to air or land/water.

REPORTABLE QUANTITIES FOR COMMONLY USED CHEMICALS/HAZARDOUS SUBSTANCES		
Chemical/Hazardous Substance Name	**Quantity of Chemical/Hazardous Substance to be Reported**	**Notes**
R-404A (blend R-125/134a/143a)		Not reportable to regulatory agencies.
R-407C (blend R-32/125/134a)		Not reportable to regulatory agencies.
R-500 (blend R-12/152)	135 lb	Release to air or land/water.
R-503 (blend R-13/23)	1.67 lb	Release to air or land/water.
Soda Ash (Sodium Carbonate)	—	Not reportable to regulatory agencies
Sodium Bicarbonate (Baking Soda)	—	Not reportable to regulatory agencies.
Sodium Carbonate (see Soda Ash)		
Sodium Hydroxide (see Caustic), liquid (50%)		
Sodium Hypochlorite (15%)	64.46 gal	
Sodium Hypochlorite (16%)	74.94 gal	
Sodium Nitrate	0.71 cf	A cube approximately 11 inches on each side, or approximately 5 gallons. Equivalent weight = 100 pounds.
Sodium Sulfate	—	Not reportable to regulatory agencies
Sodium Sulfite	—	Not reportable to regulatory agencies
Stoddard Solvent (Mineral Spirits)	1.52 gal	
Sulfuric Acid (100%)	6.5 gal	
Toluene	0.14 gal	18 fluid ounces
1,1,1-Trichloroethylene	0.08 gal	10 fluid ounces
Trichlorotrifluoroethane (see Freon 113)		
Trizol Creep	2.37 gal	
Turpentine	13.81 gal	

Note 1: Ethylene glycol releases from motor vehicles (including small amounts to soil) that are contained, and ethylene glycol releases from stationary sources that are contained on an impervious surface, which are cleaned up within 2 hours of discovery are not reportable to CIG or NYSDEC. Ethylene glycol releases that can not be contained and cleaned up within 2 hours, and all ethylene glycol releases greater than the reportable

quantity (RQ) that reach, or have the potential to reach sewers, waterways, groundwater, etc. must be documented within e2MIS and reported to CIG, and subsequently, to NYSDEC.

Note 2: Small releases (less than 50 pounds) of chlorodifluoromethane or difluorochloromethane (Freon 22) are not reportable to CIG or NYSDEC, but must be documented in e^2MIS for inclusion in an annual report to NYSDEC, as required. Individual releases of 50 pounds or more of Freon 22 are reportable to CIG and NYSDEC.

Note 3: All hazardous waste spills are reportable to CIG. A decision will be of what agencies, if any, must be notified. Telephone notifications are required if the spill threatens human health or the environment off Con Edison property, if it enters sewers or waterways, or is released to the environment at or above the RQ for the chemical components of the waste. Additional notifications may be required for PCB-hazardous wastes.

Note 4: The RQ for mercury is 1 pound or 1.28 fluid ounce. However, under an with agreement with NYC, the DEP will be notified of all mercury spills not on Company property (e.g., within customer premises), regardless of quantity.

Note 5: Small aerial cable leaks (less than 0.5 gallon) containing less than 50 parts per million (ppm) polychlorinated biphenyls (PCBs) and that do not enter sewers or waterways are not reportable to CIG or NYSDEC. These types of spills must, however, be documented within e^2MIS for inclusion in an annual report to NYSDEC, as required.

Note 6: Pentachlorophenol (PCP) releases of less than 1 pound that do not enter a waterway, and do not have the potential to enter a waterway are not reportable to CIG and/or NYSDEC, but must be documented in e^2MIS for inclusion in an annual report to NYSDEC, as required. All PCP releases that enter, or have the potential to enter a sewer or waterway, and releases of 1 pound or more to land are reportable to CIG and the NYSDEC hotline.

Note 7: The RQ of 0.08 gallons (10 fluid ounces) for PCBs is based on the release of pure PCBs. The RQ for lower PCB concentrations will be higher. The lowest regulatory RQ for PCBs is one pound. In order to reach one pound of PCBs at 500 ppm PCBs, the release volume would have to be about 260 gallons; at 50 ppm, the release volume would have to be about 2,600 gallons. Refer to PCB CEP-6.8 for additional information concerning PCB spill and fire reporting.

Note 8: The RQ is any quantity for PCB wastes, including wastes with an actual PCB concentration < 50 ppm. **ALL** spills of waste from a PCB tanker, PCB waste drum, PCB waste tank or PCB waste equipment are spills of PCB waste and, therefore, subject to this RQ, unless the spill is **KNOWN** to contain < 2 ppm PCBs in oil or < 0.5 micrograms per liter PCBs in water.

ATTACHMENT 6

REPORTING POLICY

Con Edison's policy on reporting releases of hazardous substances is to ensure that all legal requirements are met, without exception. Our policy is to report promptly to the government any and all spills or releases that trigger an obligation to report. In addition, there are significant environmental events which may not be legally reportable as spills or releases but which, under the Company's environmental excellence policy, should be brought to the attention of regulatory agencies as soon as possible. These events are sometimes difficult to recognize. However, they are sometimes characterized by situations that may potentially harm human health, by the presence of environmental contamination on customers' property, by situations where the news media may become interested, or where the presence of an environmental contaminant may alarm individuals regardless of whether the contamination is legally reportable to the government.

The process for bringing both reportable spills and releases, and significant environmental events, to the attention of the Company is the same--notify the CIG and enter the information in the e^2MIS computer system as an environmental incident. These actions will cause the Environmental Response Team member on duty to evaluate the situation and determine whether the incident is reportable to the government through the Spill Hotline established to report emergencies, or through another notification method.

From time to time in responding to spills or releases you may obtain data or sampling results that appear ambiguous or even suspect. In these cases, determining the facts with certainty and being sure whether the spill or release is reportable will depend upon gathering further information or performing additional analysis. If confirmation that the original data or sampling results were correct would result in an obligation to report, the reporting process should begin **immediately**. **Do not delay the reporting process in these cases**; call CIG and enter the information in the e^2MIS system.

Under our policy, in some cases reports will be made and then later updated as more information becomes available. Updating these initial reports is far preferable to taking the time for analysis, only to find that we may have experienced a reportable event without reporting within the required timeframe. The Company is then at risk of fines or other sanctions from government regulators.

Again, the important action for everyone in ambiguous situations is to begin the reporting process immediately.

From: DePass, Vincent E.
Sent: Wednesday, May 23, 2001 11:18 AM
To: dl - Asbestos Coordinators; dl - CEP_Review; dl - EH&S - ChemLab; dl - EARS; dl - EA Managers; dl - EH&S - ChemLab; dl - EH&S Consultants; dl - EH&S Staff; dl - Safety Administrators
Subject: Interim Procedure For Handling CESQG Hazardous Waste

Importance: High

Below please find an interim procedure for handling Conditionally Exempt Small Quantity Generator (CESQG) hazardous waste prepared by Barry Cohen and Anthony Drummings. They are preparing a hazardous waste CEP on the subject but until that is issued it is imperative that this interim procedure, which will be posted on Outlook, be followed. Any comments or questions should go directly to Barry and Anthony.

The current hazardous waste CEPs specify certain requirements and best management practices (BMPs) for managing Conditionally Exempt Small Quantity Generator (CESQG) hazardous waste. It has been determined that some of the requirements and BMPs specified in these CEPs are wrong or can be misinterpreted. EH&S plans to consolidate all CESQG hazardous waste requirements and BMPs into a new CESQG Waste CEP, which will correct these errors and clarify information that could now be misinterpreted. Pending issuance of this new CEP, we are providing the following guidance for managing CESQG hazardous waste. Where this guidance is inconsistent with the current CEPs, follow the guidance. Requirements/BMPs specified in the current CEPs and not addressed in this guidance should continue to be followed. In some cases, this guidance refers to the PCB CEPs, which include requirements for managing CESQG PCB waste.

The following guidance applies to hazardous waste that is generated at a CESQG. A CESQG is a site that generates, including those hazardous wastes generated on-site from other site occupant activities ≤220 pounds of hazardous waste in a calendar month and does not accumulate more than 2,200 pounds of hazardous waste at any time.

1. Containers holding CESQG waste must be marked or labeled with the following information:

    a. The words "CESQG Waste"
    b. Description of contents
    c. Location waste was initially generated (If the container holds CESQG waste generated at more than one location, then indicate each such location on the container).
    d. For CESQG PCB waste (refer to CEP-6.6), which includes mixed PCB and other hazardous waste (e.g. PCB and lead),

add the following:

i. PCB M_L mark
ii. PCB out of service for disposal date
iii. Known or assumed PCB source concentration

2. CESQG wastes that are generated at field locations can be brought to a Con Edison facility for consolidation. When shipping CESQG waste from field locations to a Con Edison facility:

   a. Do NOT use a hazardous waste manifest or LDR form.
   b. Do NOT place a hazardous waste shipping label on the container.
   c. Use a Central Field Services waste tracking form if the waste is not regulated as a hazardous material by the U.S. Department of Transportation (USDOT). If the waste is regulated as a USDOT hazardous material, use a shipping paper that meets USDOT requirements (contact Anthony Drummings, Barry Cohen, or Tony Muratore for guidance regarding USDOT shipping requirements). Examples of shipments subject to USDOT requirements are indicated below. Examples of USDOT shipping papers for these wastes and a blank USDOT shipping form are attached:
      i. ≥1 lb. of PCBs in a container
      ii. ≥10 lbs. of lead in a container
      iii. ≥1 lb. of mercury in a container
      iv. flammable liquids (e.g., gas condensate)
   d. Containers that are subject to USDOT requirements must also be labeled with the appropriate USDOT label and marked with the waste's USDOT shipping description (shipping name, UN Number, and, if a reportable quantity is met or exceeded, "RQ". Do not use the word "waste" in the USDOT shipping description as you would for manifested shipments.
   e. A NYSDEC-permitted vehicle with the 2A-033 designation on the rear and two sides of the vehicle must be used unless:
      i. The waste is transported by a Con Edison maintenance vehicle incidental to its primary function; or
      ii. The waste is transported by a Con Edison vehicle that hauls less than a total of 220 pounds of hazardous waste from that CESQG site in a calendar month.
   f. If the vehicle is hauling at least 99.4 pounds of PCB liquid waste, place a PCB M_L label on all 4 sides of the vehicle.
   g. CESQG waste brought from field location to a Con Ed

facility for consolidation is not counted when determining the generator status of that facility.

3. Consolidate CESQG waste at Con Edison facilities as follows:

    a. CESQG PCB waste must be consolidated and managed in a 30-day PCB temporary storage area or the Astoria PCB Storage Facility, as described in CEP-6.7.
    b. Non-PCB CESQG waste can be consolidated in a 90-day central hazardous waste accumulation area (for large quantity generators), in a 180-day central hazardous waste accumulation area (for small quantity generators), or in a separate CESQG waste area.
        i. Separate CESQG waste consolidation areas should be designated by a "CESQG Waste" sign. These areas are not subject to formal hazardous waste inspection or other hazardous waste accumulation requirements. However, the area should be inspected periodically to insure that the containers are properly labeled, closed, are in good condition, and are not leaking.
        ii. CESQG wastes that are consolidated in 90-day or 180-day central hazardous waste accumulation areas must be managed in the same manner as other hazardous wastes accumulated in those areas (including weekly inspections), except that secondary containment is not required for CESQG wastes. Do not commingle CESQG waste with the waste generated at the Con Edison facility. You may commingle similar (e.g., Lead paint chips with Lead paint chips) CESQG wastes brought to the Con Edison from different locations. If you commingle CESQG wastes, make sure the container is marked with the locations where all those wastes were generated or keep a log of the locations.

4. When shipping CESQG PCB wastes from a field location or a Con Edison facility to a commercial facility, you must use a 5-part uniform hazardous waste manifest but no LDR form. Refer to PCB CEPs-6.10 and 6.11 for detailed requirements. If the vehicle is hauling at least 99.4 pounds of PCB liquid waste, place a PCB M_L label on all 4 sides of the vehicle. If one or more containers in the shipment holds one pound or more of PCBs, the shipment is subject to USDOT requirements. In this case, add the following to the containers holding at least one pound of PCBs:
    a. affix a Class 9 USDOT label to the container;

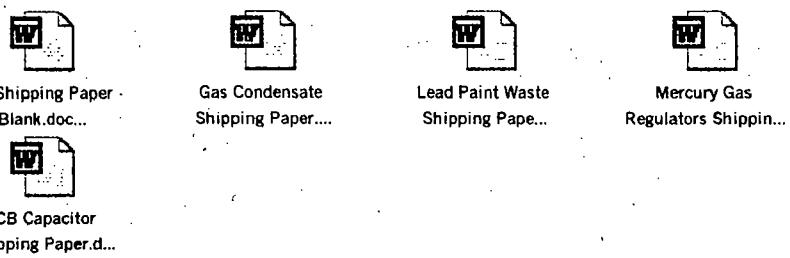
b. mark or label the container with the appropriate USDOT shipping description, "UN2315", and "RQ."

5. When shipping non-PCB CESQG wastes from a field location or from a Con Edison facility to a commercial facility:

    a. Do NOT use a hazardous waste manifest or LDR form.
    b. Do NOT place a hazardous waste shipping label on the container.
    c. If the waste is not a USDOT hazardous material use a bill of lading or similar document. If the waste is regulated as a USDOT hazardous material, use a shipping paper that meets USDOT requirements (contact Anthony Drummings, Barry Cohen, or Tony Muratore for guidance regarding USDOT shipping requirements). Examples of shipments subject to USDOT requirements are:

        i. ≥10 lbs. of lead in a container
        ii. ≥1 lb. of mercury in a container
        iii. flammable liquids (e.g., gas condensate)

    d. Containers that are subject to USDOT requirements must also be labeled with the appropriate USDOT label and be marked with the waste's USDOT shipping description (shipping name, UN Number, and, if a reportable quantity is met or exceeded, "RQ").
    e. A NYSDEC-permitted vehicle with the 2A-033 designation on the rear and two sides of the vehicle must be used unless:
        i. The waste is transported by a Con Edison vehicle that hauls less than a total of 220 pounds of hazardous waste from that location in a calendar month.



CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
ENVIRONMENT, HEALTH, AND SAFETY
4 IRVING PLACE
NEW YORK, NEW YORK 10003

ES-030

ENVIRONMENTAL SPECIFICATION FOR THE MANAGEMENT OF MERCURY WASTES NOT COVERED BY THE UNIVERSAL WASTE RULE

Approved by: Daniel N. Battista

Date:5/04/98

This specification has been prepared for inclusion in a contractor request for bid or request for proposal. This specification is not intended to describe the process to be used by Con Edison Operating Departments.

SCOPE OF WORK

The Contractor shall furnish to Consolidated Edison Company of New York, Inc. (hereinafter Con Edison) all labor, supervision, material, equipment, vehicles, fuel, highway use taxes, insurance, federal and state-approved treatment/disposal/recycling facility services, permits, licenses, other forms of governmental approval, spill prevention control and countermeasure equipment and materials, and any other services necessary to manage, remove, transport, recycle through retorting, or dispose of mercury wastes not covered by the universal waste rule (hereinafter "mercury waste"), including, but not limited, to elemental mercury, mercury-containing devices (e.g., regulators, float switches, thermometers, and sphygmomanometers), mercury-containing solids, and mercury-containing glass devices.

The Contractor shall provide a complete technical proposal as delineated in the Bid Deliverables section of this specification (including a completed Exhibit I). Only those proposals submitted by Contractors (using Subcontractors, if necessary) that provide complete removal, transportation, and treatment/recycling/disposal services will be accepted. Bidders who propose to act only as brokers or transporters or whose technical proposals do not offer complete waste removal and recycling/disposal services will not be considered qualified bidders for the work. Should Con Edison elect to perform the transportation itself, then proposals shall address all services with the exception of transportation and transportation-related services.

The waste shall be removed from Con Edison facilities located in New York City and Westchester, Orange, and Rockland Counties as indicated in the bid scope of work. The waste shall be managed in accordance with all applicable federal, state, and local laws, ordinances, regulations, directives, and orders. These laws and regulations include, but are not limited to, the following:

1. Federal Resource Conservation and Recovery Act (RCRA).

2. New York State Environmental Conservation Law (ECL).

3. New York State Department of Environmental Conservation (NYSDEC) regulations governing solid and hazardous waste - 6 NYCRR Parts 364, 370, 371, 372, and 373.

TRANSFER OF TITLE

The Contractor shall take title to all mercury wastes when loaded into its trucks or other vehicles. The Contractor shall assume full responsibility for any and all personal injuries, property damage, and violations of federal, state, and local laws, ordinances, regulations, directives, and orders that may occur during or arise from the loading, transportation, storage, treatment, recycling, or disposal of the mercury wastes.

The Contractor shall indemnify and hold Con Edison harmless for any and all liability for personal injuries, damage to property (including Con Edison's property), and statutory or civil administrative or criminal penalties for failure to comply with applicable laws, regulations, and

orders arising from, or directly or indirectly connected with, the performance of the work by the Contractor (or its Subcontractors). The Contractor shall indemnify and hold the Company harmless for any and all liability or damage resulting in whole or part from the Contractor's (or its Subcontractors) acts or omissions or failure to comply with federal, state and local laws, ordinances, regulations, directives, and orders.

CON EDISON'S RESPONSIBILITIES

Con Edison shall place the mercury waste into Department of Transportation (DOT)-approved open-head drums and shall top-off the drums with an appropriate fill material. Mercury solids should be placed in drums unless larger containers with vapor-tight seals are available. Con Edison shall be responsible for placing and, at the Contractor's direction, arranging the drummed mercury waste onto the Contractor's vehicle, but only for placing drums onto the tailgate of the Contractor's vehicle. The Contractor shall pick up, transport, and recycle and/or dispose of the drummed mercury wastes as directed by Con Edison's Authorized Representative and in accordance with the Contractor's approved technical proposal.

CONTRACTOR'S RESPONSIBILITIES

1. Transportation (if requested by Con Edison)

   The Contractor shall provide suitable covered or enclosed vehicles for transporting drummed mercury waste materials. The Contractor shall be responsible for securing the drums onto their vehicles, following their placement and arrangement by Con Edison. The Contractor shall provide a suitable hand truck to move and/or arrange the drums on their vehicle. All motor vehicles, packages, and drums used for transporting mercury wastes will be marked, labeled, or otherwise identified and handled in accordance with U.S. Environmental Protection Agency (EPA) and DOT regulations.

   The Contractor shall provide and deploy spill control and containment equipment sufficient to contain and clean up any spill that might reasonably be expected to occur during the loading of the mercury waste materials.

   The Contractor, or its designated emergency response Subcontractor, shall provide, or be able to respond with sufficient spill control equipment and material to contain and to clean up any spill that might occur after the mercury waste materials have been loaded onto their vehicles and during any stage of the transportation. The Contractor's personnel shall also supply their own personal protective equipment which shall be worn during loading operations.

2. Permits

   The Contractor shall submit to Con Edison's Purchasing Department a current and complete permit file of federal, state, and local permits for all Contractors,

Subcontractors, vehicles, transporters, and treatment, storage, disposal, and recycling (TSDR) facilities to be used in performance of the work. The Contractor shall submit permit applications as soon as they are filed for all permits that expire during the term of any contract awarded. Revised permits shall be sent to Con Edison immediately following receipt by the Contractor. Permit applications and revised permits shall be sent to Con Edison's Authorized Representative.

3. Subcontractors

Should the Contractor desire to revise its list of transportation, emergency response, and/or TSDR facility Subcontractors (hereinafter the Subcontractors list) after submission of its bid and before the award of the contract, the Contractor shall notify and receive approval from Con Edison's Purchasing and Environment, Health, and Safety (EH&S) Departments to modify its original proposal. The Contractor shall then submit all the material required under the Bid Deliverables section of this specification to Con Edison's EH&S Department for Con Edison's technical review and approval.

Should the Contractor desire to revise its Subcontractors list after the award of the contract or during the term of a specific project and/or contract, the Contractor shall immediately notify Con Edison's Authorized Representative. The Contractor will be required to provide all the material required under the Bid Deliverable section of this specification to Con Edison's Authorized Representative. The Contractor may not use any new Subcontractor until the Contractor has received written notification approving said use from Con Edison's Authorized Representative.

4. Manifests

The Contractor shall supply to Con Edison's Authorized Representative all completed pertinent manifests, land ban certifications, and hazardous waste labels. The Contractor shall also immediately inform Con Edison's Authorized Representative of any changes in the required information. The Contractor shall promptly send by certified mail to Con Edison signed copies of all manifests required under federal, state, and local laws, ordinances, regulations, and directives and orders in connection with the removal, transportation, and treatment or disposal of the waste materials under this contract, including the Generator Copy (Copy 3) of all New York State Uniform Hazardous Waste Manifests or other disposal state's Uniform Hazardous Waste manifests as indicated in the vendor's technical proposal prepared in connection with the work to be performed hereunder.

Pursuant to Title 6, Codes, Rules and Regulations of the State of New York (NYCRR) 372.2(c)(3), Exception Reporting, Con Edison will notify the Contractor, if Con Edison has not received a copy of any required signed manifests within 35 days of the shipment date. The Contractor shall then provide the required manifest within five (5) days of receipt of Con Edison's notification. Should the Contractor fail to comply, Con Edison will file, as required by 6 NYCRR 372.2(c)(3), an Exception Report with the New York

State Department of Environmental Conservation (NYSDEC) and the equivalent authority in the state where the mercury wastes were delivered for recycling or disposal.

5. Labels, Markings, Placards

The Contractor shall provide and complete all hazardous waste labels, markings, and placards required for the proper storage and transport of all mercury wastes.

6. Spills

If a spill occurs at a Con Edison facility during the Contractor loading, transfer, or storage operations, or during any phase of waste transport, storage, or recycling/disposal, the Contractor shall clean up the spill in accordance with all applicable federal, state, and local laws, ordinances, regulations, orders, and directives. Con Edison will not be liable for any cost associated with cleanup and decontamination of such spills. Con Edison shall be immediately notified by the Contractor when a spill has occurred.

7. Certificate of Reclamation/Certificate of Disposal

The Contractor shall provide a Certificate of Reclamation/Certificate of Disposal (Certificate) to Con Edison's Authorized Representative for each and every mercury waste shipment. An explanation shall be provided of all waste codes and other terminology used on the Certificate to enable Con Edison to understand clearly all phases of the reclamation/disposal action. The Certificate must state:

a. The name, address, and EPA ID number of the TSDR facility.

b. The shipment's manifest number(s).

c. The date the shipment left Con Edison's site.

d. The shipment's arrival date at the TSDR facility.

e. The date(s) the mercury wastes were reclaimed.

f. A certification that the information is true, accurate, and complete.

All Subcontractor Certificates shall be included with, or incorporated into, a single Contractor Certificate covering all mercury wastes removed for reclamation/disposal.

All mercury wastes received from Con Edison must be recycled or disposed of within 90 days after their removal from Con Edison's site. Should the Contractor be unable to comply with this requirement due to force majeure (or other causes), the Contractor shall notify Con Edison's Authorized Representative immediately in writing of the extenuating circumstances causing the delay, the corrective actions to be taken (if applicable), and the Contractor's best estimate for the new reclamation date(s).

BID DELIVERABLES

The Contractor shall be responsible for submitting a complete technical proposal package as specified herein within any deadline specified by Con Edison's Purchasing Department. Failure to submit the information specified below within this deadline shall be cause for determining that the Contractor's technical proposal is not acceptable. The Contractor shall include, or incorporate into the technical proposal, all applicable bid deliverables required of its Subcontractors. Separate submittals from Subcontractors will not be accepted.

The Contractor shall provide for itself and for all Subcontractors to be used:

1. A technical proposal that clearly and sufficiently describes the sequence of events, including procedures that will be employed, and approximate time frames for tracking the movement of mercury wastes from the site of generation to the site of final disposition. This discussion should specifically identify the methods, facilities, and Subcontractors that will be employed for managing the mercury waste and any scrap materials generated from recycling of the waste. While recycling and disposal are acceptable methods for managing mercury waste, it is Con Edison's policy that recycling through retorting (the EPA Best Demonstrated Available Technology [BDAT] for mercury waste) is preferred. Disposal of mercury waste is acceptable only for residuals with non-recoverable amounts of mercury. The Contractor must submit a completed Exhibit I of this specification.

2. At the request of Con Edison, an Environmental, Health, and Safety Plan (EHS Plan). The EHS Plan shall be a job-specific plan that addresses the environmental, health, and safety practices that will be employed by the Contractor's site workers participating in activities at the job site. The EHS Plan shall include discussions of the following subjects, as appropriate: project overview; project organization and responsibilities; potential hazards of the job site; an activity hazard analysis; personal protective equipment; job site control, protection, and communications; safety considerations; waste disposal practices; emergency response plan; training and certifications; logs, reports, and recordkeeping; and environmental and work permits.

3. All pertinent federal, state, and local permits, licenses, approvals, and notices of registration complete with terms and conditions, and other information identified below, necessary to transport, as appropriate, mercury wastes generated to all facilities listed in the Contractor's proposal, and to operate all TSDR facilities. The Contractor's technical proposal must also include a complete permit package for all Subcontractors. Such permits, licenses, notifications, and other forms of governmental approval shall include, as appropriate:

   a. EPA RCRA ID numbers(s) to transport hazardous wastes.

   b. Current New York State's Waste Transporter's Permit(s), pursuant to 6 NYCRR 364 (hereinafter the "364 Permit").

c. All other state and local permits, licenses, governmental approvals, and notices of registration necessary to transport the mercury wastes to each and every TSDR facility listed in the Contractor's proposal. The Contractor shall identify all states to be traversed during transport to the TSDR facility(ies), shall provide copies of required approvals for each state, and shall identify any traversed states that do not require such approval.

d. Federal, state, and local approval to operate, treat, recycle or dispose of mercury wastes by an approved method.

e. National or State Pollutant Discharge Elimination System permit or local approval for discharge to publicly owned treatment works (if applicable).

4. A copy of the current Spill Prevention Control and Countermeasure (SPCC) Plan for each transporter and TSDR facility included in the management of the waste. Transporters shall list the SPCC equipment they maintain on their vehicles. If emergency response firms for over-the-road chemical spills are employed, the Contractor shall define each firm's geographical area of responsibility and provide an estimate of each firm's response time within its area of responsibility.

5. The Contractor shall provide a statement that mercury wastes received from Con Edison will be recycled or disposed of within 90 days after their removal from Con Edison's site. The Contractor should also be cognizant of Con Edison's desire that wastes handled under this contract be taken from the site of generation to the site of treatment in a direct and timely manner. Con Edison strongly discourages excessive handling and transfer of mercury wastes. Discouraged practices include: transfer of mercury wastes from Contractor's or any Subcontractor's vehicle(s) to other vehicle(s) or the waste storage at interim storage facilities for protracted periods of time. The degree to which the Contractor's proposal follows this policy is one of the evaluative criteria which will be heavily weighted by Con Edison in reviewing bid proposals.

   The Contractor may propose handling procedures and terms that may not be in complete accord with this policy. In such cases, though, the Contractor must provide a discussion and justification for its exceptions (see CONTRACTOR'S EXCEPTIONS).

6. A complete listing of any notices of violation, citations, or administrative complaints issued against the Contractor and its proposed Subcontractors during the last three (3) years by any federal, state, or local agency for any and all other site(s), facilities, and Subcontractors described in the proposal. If no such notices, citations, or complaints were issued, so state in the proposal. The Contractor shall also supply a copy of any correspondence received from federal, state, or local agencies relating to the most recent federal, state, or local compliance inspections of its site(s) and shall provide a copy of any response to each correspondence. If no such correspondence was received or response issued, so state in the proposal. Notices of violation, citations, complaints (administrative, civil, or criminal), etc. received by the Contractor after the submission of its bid, but before the award of the contract, shall also be provided to Con Edison within

one (1) week of their receipt by the Contractor. Failure to provide all such results of inspections, notices, citations, etc., as clearly delineated in this paragraph shall be grounds for finding the Contractor's technical proposal to be unacceptable and for terminating any contract awarded without further liability on behalf of Con Edison.

Notices of violation and/or inspection results received during the term of this contract shall likewise be submitted within one (1) week of their receipt. Failure to provide these items within the time specified shall be deemed a breach of a material provision of the contract award and shall entitle Con Edison, at its option, to terminate such contract without further liability on its part.

Con Edison reserves the right to inspect the Contractor's (and any Subcontractor's) site(s) and facility(ies), and to review pertinent on-site documentation (e.g., disposal manifests) pertaining to the transport and treatment, storage, disposal, or recycling of materials covered by this contract prior to and at any time after award of contract.

7. A detailed description of recordkeeping procedures that will be used and a statement of records that will be provided or made available to Con Edison as required by this scope of work.

The prospective Contractors who have submitted, as a part of their pre-qualification package, some or all permits and other documents required in paragraphs 3., 4, and 6 above to Con Edison's EH&S Department do not need to include such documents in their technical proposals.

EVALUATIVE CRITERIA

The Contractor's technical proposal shall be reviewed based on, but not limited to, the following: (1) completeness; (2) demonstration of understanding of the scope of work; (3) the degree to which the mercury wastes handled under this contract are taken in a direct and timely manner from the sites of generation to the sites of treatment; (4) agreement to submit Certificates within 90 days from the removal of mercury wastes from Con Edison's sites; (5) adequacy of plans to prevent, control, contain, and clean up spills that might occur during the loading and transport of mercury wastes and during storage for treatment, (6) past performance, including statutory and regulatory compliance of the Contractors, (7) time frame for disposal of all waste materials, and (8) the degree to which the Contractor's management practices minimize Con Edison's long-term liabilities.

CONTRACTOR'S EXCEPTIONS

All sections of the environmental specification to which the Contractor takes exception must be clearly identified by their page, paragraph, and sentence. The Contractor must succinctly describe how these sections could hamper operations or impose undue operating constraints. For each section to which an exception has been taken by the Contractor, the

Contractor shall suggest alternative methods. Said alternative methods shall be sufficient both to enable the Contractor to expeditiously transport and treat, salvage, or dispose of the equipment and its contents, as applicable, and to satisfy Con Edison that the aforesaid will be performed in accordance with all pertinent federal, state, and local laws, regulations, ordinances, directives, and orders.

SPECIFICATION ES-030 - EXHIBIT I
CERTIFICATION: TSDR FACILITY, TRANSPORTER, AND SUBCONTRACTOR

INSTRUCTION:
1) Detach and complete this form. Make copies if necessary.
2) An officer of the firm must sign and date this form.
3) Submit form(s) and Bid Deliverables with technical proposals.

Contractor: _____

1. TRANSPORTERS

Transporter #1
Name: _____
Address: _____
Town, State, Zip: _____
EPA ID No.: _____
Transporting From: _____
To: _____

Transporter #2
Name: _____
Address: _____
Town, State, Zip: _____
EPA ID No.: _____
Transporting From: _____
To: _____

Transporter #3
Name: _____
Address: _____
Town, State, Zip: _____
EPA ID No.: _____
Transporting From: _____
To: _____

SPECIFICATION ES-030 - EXHIBIT I (CONTINUED)
CERTIFICATION: TSDR FACILITY, TRANSPORTER, AND SUBCONTRACTOR

Contractor: _____

2. TREATMENT, STORAGE, DISPOSAL, AND RECYCLING FACILITIES
(including Temporary Storage)

TSDR FACILITY #1

Name: _____

Address: _____

Town, State, Zip: _____

EPA ID No.: _____

Activity*: _____

Waste Acceptance Criteria**: _____

TSDR FACILITY #2

Name: _____

Address: _____

Town, State, Zip: _____

EPA ID No.: _____

Activity*: _____

Waste Acceptance Criteria**: _____

TSDR FACILITY #3

Name: _____

Address: _____

Town, State, Zip: _____

EPA ID No.: _____

Activity*: _____

Waste Acceptance Criteria**: _____

* Identify activity: storage, the type of treatment, or the manner of disposal (e.g., landfilling, incineration).

** Specify tests required and the acceptance criteria. Attach another sheet if necessary.

SPECIFICATION ES-030 - EXHIBIT I (CONTINUED)
CERTIFICATION: TSDR FACILITY, TRANSPORTER, AND SUBCONTRACTOR

Contractor: _____

3. BIDDER'S STATEMENT OF CERTIFICATION

I CERTIFY THAT THE FOREGOING INFORMATION IS ACCURATE, AND COMPLETE, AND THAT THE MERCURY WASTE(S) WILL BE REMOVED, TRANSPORTED, TREATED, AND DISPOSED OF IN ACCORDANCE WITH ALL APPLICABLE FEDERAL, STATE, AND LOCAL LAWS, REGULATION, ORDINANCES, DIRECTIVES, AND ORDERS.

I ALSO CERTIFY THAT THE TRANSPORTERS ARE AUTHORIZED TO DELIVER THE WASTE TO THE DESIGNATED TSDR FACILITY.

_____ Date

_____ Signature

_____ Name

_____ Position Title

_____ Firm's Name

SPECIFICATION ES-030 - EXHIBIT I (CONTINUED)
CERTIFICATION: TSDR FACILITY, TRANSPORTER, AND SUBCONTRACTOR

Contractor: _____

Waste Stream: _____

4. TSDR FACILITY'S STATEMENT OF CERTIFICATION

(IF MORE THAN ONE TSDR FACILITY WILL BE UTILIZED, EACH TSDR FACILITY'S REPRESENTATIVE MUST COMPLETE THIS SECTION. USE ADDITIONAL SHEETS AS NECESSARY.)

I CERTIFY THAT THE DESIGNATED TREATMENT, STORAGE, DISPOSAL, OR RECYCLING (TSDR) FACILITY IS AUTHORIZED AND HAS THE CAPACITY TO RECEIVE THE WASTE COVERED BY THIS SPECIFICATION, AND THAT THE DESIGNATED DISPOSAL METHODS WILL BE PROVIDED.

_____ _____

Signature Date

_____

Name

_____

Position Title

_____

Firm's Name

GENERAL ENVIRONMENTAL INSTRUCTION

SPILL REPORTING

GEI 02.01 – Spill Response And Cleanup

Revision #6 – 02/01/2001

IDENTIFICATION

This GEI describes the steps that must be taken to report oil and chemical spills, including de minimis oil spills, non-de minimis oil spills, PCB spills, and liquid or solid chemical spills. For asbestos releases, see the Asbestos Management Manual. This instruction does not apply to gas releases (for example, carbon monoxide and methane/natural gas), unless the gas is specifically included in Attachment 02.01-1 (for example, Freon 22 and Freon 113).

PREPARATION

- To select training applicable to job-specific conditions associated with this GEI, refer to Appendix A, Selection of Job-Specific Training Requirements.
- If a chemical spill occurs at a facility that has a Spill Prevention Report (prepared according to New York State bulk chemical storage regulations), the Spill Prevention Report will outline a plan for spill response.

PERSONAL PROTECTIVE EQUIPMENT

Before beginning work, determine what potential hazards may exist and select the appropriate level of protection necessary. Refer to the Hazard Assessment Flow Diagram presented in Appendix B to select the proper personal protective equipment (PPE) based on potential hazards at the work site.

> **NOTE: See your supervisor if you are not sure of the selection of proper PPE.**

INTERNAL REPORTING PROCEDURE

- If you discover a spill of any liquid or solid material, you must **immediately** notify your supervisor, shift manager/supervisor, and/or Control Center, who will contact CIG. CIG will notify all appropriate regulatory agencies. Some agency notifications must be made as soon as 30 minutes after the spill is discovered, so internal notifications must be made promptly.
- If you determine that an aboveground storage tank or an underground storage tank is or was leaking, you must **immediately** notify your immediate supervisor, shift manager/supervisor, and/or Control Center.

- When you discover an oily sheen on surfaces such as parking lots, if you believe that the oily sheen came from a specific vehicle or piece of equipment on Con Edison property you must **immediately** notify your immediate supervisor, shift manager/supervisor, and/or Control Center, who will contact CIG.
- You must provide information on the spill to your immediate supervisor, shift manager/supervisor, and/or Control Center, who must pass this information on to CIG. This information includes, but is not limited to, such things as: who discovered the spill, the source and cause of the spill, who is responsible for the spill, the location of the spill, the time the spill occurred and/or was discovered; the type of substance spilled, the amount spilled, the environmental media (water, soil bluestone, etc.) impacted by the spill, whether the spill has been controlled and contained, whether an emergency situation (*e.g.,* active smoker, fire, large uncontrolled release to the environment) exists, and if any private property was affected, etc. Attachment 02.01-2 should be used as a tool to aid you in gathering the spill information that must be provided to CIG.

  REMEMBER: Do not delay contacting your immediate supervisor, shift manager/supervisor, and/or Control Center and/or CIG to collect all of this information. Make the contact immediately and update with additional information, if necessary.

- The following information should be gathered after the initial spill report is made. The spill finder may gather it, or it may be gathered by one or more individuals associated with spill sampling, cleanup, waste management, spill or spill regulatory close out.
  - What actions are being taken to clean up the spill and who supervised it and was involved? Are PCBs present or suspected? If so, the type and PCB concentration (if known).
  - Whether any samples have been collected, type of sample, source and if they are needed for cleanup?
  - Sample locations, collection method, lab results etc?
  - Tests on the equipment involved, repairs made and engineering controls applied?
  - Waste generated?
  - Any post cleanup investigation including structure/duct examination and post cleanup wipe samples?
- Your supervisor, your shift manager/supervisor, or your Control Center will make all required entries into the spills module of e^2MIS.

  NOTE: Do not report carbon monoxide and methane gas releases on e^2MIS.

INTERNAL REPORTING TO CIG

- Depending on which organization the person who discovered the spill is from, either the immediate supervisor, shift manager/supervisor, and/or Control Center will notify the Central Information Group (CIG) of spills. Attachment 02.01-3 is a flow chart showing when CIG must be notified of a petroleum release in an underground structure. Attachment 02.01-4 is a flow chart showing when CIG must be notified of a petroleum release other than in an underground structure. Attachment 02.01-5 is a flow chart showing when CIG must be notified of a hazardous substance release.
- Con Edison has established a telephone line (212 684-2030) to CIG for use in environmental emergencies **only**. Environmental emergencies are those events that may endanger the public health or result in contamination of the environment. Examples of such emergencies include:
  - An oil spill to a waterway, storm drain, or sewer system.
  - A reportable chemical/hazardous substance spill, but not an oil spill, as identified on Figure Attachment 2.01-1.
  - A steam line rupture resulting in a suspected or confirmed asbestos release to the environment.
  - A spill of 25 barrels (1,050 gallons) or more of oil from an inter-facility pipeline.
  - A failure of company equipment resulting in a threat to the environment, or which may attract media attention.
  - A spill associated with a transformer fire.
  - The receipt of data or sampling results that appear ambiguous or suspect.
- For those spills reported to CIG, the immediate supervisor, shift manager/supervisor, and/or Control Center must provide CIG with the information provided to them, as well as the e^2MIS Incident Number provided by the system. Note: For environmental emergencies, it is not necessary to provide CIG with an e2MIS Incident Number initially.
- If a spill was not originally reportable to CIG, but conditions change such that the spill becomes reportable after the initial internal notification, CIG must be notified of the change in status. The spill report in e^2MIS must also be updated. Also, if a spill was reported to CIG but the conditions of the spill later change significantly, you must update CIG with new information. The following list presents examples of changes in conditions that may occur after the initial internal spill report. Such conditions require that CIG be contacted.
  - An oil spill changing from de minimis to non-de minimis (for example, more than 2 hours (aboveground) or 24 hours (in underground structures) is required to complete the cleanup).

- The reportable quantity of the spill was exceeded after the initial internal notification.
- The amount of substance spilled is significantly more than was originally estimated.
- PCB sample results indicate a different concentration range (for example, 0 to < 50 ppm, 50 < 500 ppm, or 500+ ppm) from that originally reported.
- If a PCB concentration was not initially reported (*e.g.*, the concentration was unknown), any subsequent analytical PCB results.
- The impact to the environment is different from what was originally reported (for example, subsequent knowledge that the spill impacted a waterway).

REPORTABLE QUANTITIES

- Con Edison is required by law to report spills of many types of chemicals to the appropriate local, state, and federal agencies. These chemicals are listed in various local, state, and federal regulations.
- Certain laws only require reporting when a "reportable quantity" ("RQ") of a chemical is released. Other laws require reporting whenever any amount of a chemical is released to the environment. Attachment 02.01-5 is a flow chart showing when chemical releases must be reported to CIG.
- RQs of chemicals commonly used by Con Edison are provided in this GEI in Attachment 02.01-1.

EXTERNAL REPORTING PROCEDURE

CIG, assisted by Environment, Health, and Safety (EH&S), is responsible for determining which spills must be reported to the regulatory agencies, and for reporting those spills within a short time after the spill occurs.

RECORDING

- All spills must be documented by the Operating Department in e^2MIS. This documentation must be made available to regulatory agency inspectors upon request.
- The e^2MIS report must be forwarded to EH&S and the Associate General Counsel - Environment, Law Department, if the spill was reportable to regulatory agencies and/or if the spill required post-cleanup sampling.
- Some laws require written follow up reports to environmental agencies after an initial telephone notification of a spill. EH&S will prepare these reports. If you are involved in a spill event, EH&S may contact you for information required for a written follow

up report. All Con Edison personnel are required to assist EH&S in obtaining information required to meet Con Edison's release reporting obligations.

- Current Con Edison policy requires that records of spills (that is, e^2MIS reports, incident reports, or similar reports) be maintained for a minimum of 10 years, then archived indefinitely.

ATTACHMENT 02.01-1

REPORTABLE QUANTITIES FOR COMMONLY USED CHEMICALS/HAZARDOUS SUBSTANCES		
Chemical/Hazardous Substance Name	**Quantity of Chemical/Hazardous Substance to be Reported**	**Notes**
Acetone	0.15 gal	19 fluid ounces.
Aero-O-Foam	1.75 gal	
Aero-O-Foam XL3	1.7 gal	
Alum (Aluminum Sulfate)	0.59 cu ft	For solid, a cube approximately 10 inches each side. Equivalent weight = 100 pounds.
Aluminum Sulfate (see Alum)		
Amertrol C 354 Deposit Inhibitor	9 gal	
Ammonium Bicarbonate	—	Not reportable to regulatory agencies.
Ammonium Bifluoride	1.3 cu ft	For solid, a cube approximately 13 inches each side, or approximately 9.5 gallons. Equivalent weight = 100 pounds.
Ammonium Carbonate	1 cu ft	For solid, a cube approximately 12 inches each side, or approximately 7.5 gallons. Equivalent weight = 100 pounds.
Ammonium Hydroxide	13 gal	
Antifreeze (Ethylene Glycol)	0.13 gal	16.5 fluid ounces (See Note 1).
Asbestos (minimum 1% by weight)	0.007 cu ft (100%) 0.7 cu ft (1%)	For 100% asbestos, a cube approximately 3 inches each side. Equivalent weight = 1 pound. For 1% asbestos, a cube approximately 10.5 inches each side. Equivalent weight = 100 pounds.
Benzene (Drip Pot Liquids)	0.14 gal	18 fluid ounces.

REPORTABLE QUANTITIES FOR COMMONLY USED CHEMICALS/HAZARDOUS SUBSTANCES		
Chemical/Hazardous Substance Name	**Quantity of Chemical/Hazardous Substance to be Reported**	**Notes**
Biosperse 261T	1.67 cf	For solid, a cube approximately 14 inches each side. Equivalent weight = 100 pounds.
Calcium Hydroxide (see Lime)		
Caustic (Sodium Hydroxide) Liquid	15 gal	(50% concentration).
Chlorodifluoromethane (see Freon 22)		
Citric Acid	—	Not reportable to regulatory agencies.
Citrikleen	12 gal	
Clamtrol CT-1	0.39 gal	49 fluid ounces.
Corexit	12 gal	
D-Limonene	14 gal	
Difluorochloromethane (see Freon 22)		
Disodium Phosphate	0.8 cu ft	A cube approximately 11 inches on each side, or approximately 6 gallons. Equivalent weight = 100 pounds.
Drip Pot Liquids (see Benzene)		
EDTA (Ethylene Diamine Tetraacetic Acid)	0.02 cu ft	A cube approximately 3 inches on each side. Equivalent weight = 1 pound.
EDTA, Tetraammonium	—	Not reportable to regulatory agencies
EDTA, Tetrasodium Salt (See Amertrol C 354 Deposit Inhibitor)		
Elimin-Ox	1,164 gal	
1,2 ethanediol (See Ethylene Glycol)		
Ethanolamine	11.75 gal	

REPORTABLE QUANTITIES FOR COMMONLY USED CHEMICALS/HAZARDOUS SUBSTANCES		
Chemical/Hazardous Substance Name	**Quantity of Chemical/Hazardous Substance to be Reported**	**Notes**
Ethylene Glycol	0.11 gal	14 fluid ounces (See Note 1)
Ferric chloride	0.55 cu ft	A cube approximately 10 inches on each side, or approximately 4 gallons. Equivalent weight = 100 pounds.
Formaldehyde Solution, 50% (1.5% Methanol)	0.2 gal	26 fluid ounces
Freon 11 (gas)	100 lb	Release to air.
Freon 11 (liquid)	1 lb	Release to land/water.
Freon 12 (gas)	5,000 lb	Release to air.
Freon 12 (liquid)	100 lb	Release to land/water.
Freon 22 (Chlorodifluoromethane or Difluorochloromethane) (gas or liquid)	1 lb	(See Note 2) Release to air or land/water.
Freon 113 (gas or liquid)	1 lb	Release to air or land/water.
Freon 502 (gas or liquid)	1.95 lb	Release to air or land/water.
Gasoline	1.5 gal	
Glycol Distearate	—	Not reportable to regulatory agencies
Hazardous Waste	any quantity	
Hydrazine Hydrate	11.5 gal	
Hydrochloric Acid (28%)	10.5 gal	
Hydrofluoric Acid (50%)	20 gal	
Inhibitor A-191	—	Not reportable to regulatory agencies
Isopropyl Alcohol (100%)	15 gal	
Lead	0.01cu ft for 100% lead	A cube approximately 2.5 inches each side. Equivalent weight = 10 pounds.
Lime (Calcium Hydroxide)	—	Not reportable to regulatory agencies.

REPORTABLE QUANTITIES FOR COMMONLY USED CHEMICALS/HAZARDOUS SUBSTANCES		
Chemical/Hazardous Substance Name	**Quantity of Chemical/Hazardous Substance to be Reported**	**Notes**
Magnesium Oxide	—	Not reportable to regulatory agencies.
Mercury	0.01 gal	1.28 fluid ounces For NYC facilities (See Note 4).
Mineral Spirits (see Stoddard Solvent)		
Monoethanolamine	11.5 gal	
Nitric Acid	8 gal	
Oil	Any spill other than a de minimis spill	De minimis spill must meet all of the following criteria: **In Underground Structure** • 5 gallons or less • No sewer connection • No earth floor/sump • No oil seeping in via floor/walls/conduits • Leaks from Con Edison equipment controlled and cleanup completed in 24 hours. **Not In Underground Structure** • 5 gallons or less • Contained and controlled • Cleaned up in 2 hours.
PCBs (Polychlorinated Biphenyls)	0.08 gal	10 fluid ounces (See Notes 5 and 7).
PCB Waste	Any Quantity	See Note 8.
Pentachlorophenol	0.01 cu ft	A cube approximately 2.5 inches on each side. (See Note 6) Equivalent weight = 1 pounds.

REPORTABLE QUANTITIES FOR COMMONLY USED CHEMICALS/HAZARDOUS SUBSTANCES		
Chemical/Hazardous Substance Name	**Quantity of Chemical/Hazardous Substance to be Reported**	**Notes**
Potassium Permanganate	0.59 cu ft	A cube approximately 10 inches each side, or approximately 4.5 gallons. Equivalent weight = 100 pounds.
Propanol	14.89 gal	
Propylene Glycol	12 gal	
R-13 chlorotrifluoromethane	1 lb	Release to air or land/water.
R-115 monochloropentafluoroethane	1 lb	Release to air or land/water.
R-401A (blend R-22/124/152A)	1.89 lb	Release to air or land/water.
R-402A (blend R-22/125/290)	2.63 lb	Release to air or land/water.
R-404A (blend R-125/134a/143a)		Not reportable to regulatory agencies.
R-407C (blend R-32/125/134a)		Not reportable to regulatory agencies.
R-500 (blend R-12/152)	135 lb	Release to air or land/water.
R-503 (blend R-13/23)	1.67 lb	Release to air or land/water.
Soda Ash (Sodium Carbonate)	—	Not reportable to regulatory agencies
Sodium Bicarbonate (Baking Soda)	—	Not reportable to regulatory agencies.
Sodium Carbonate (see Soda Ash)		
Sodium Hydroxide (see Caustic), liquid (50%)		
Sodium Hypochlorite (15%)	64.46 gal	
Sodium Hypochlorite (16%)	74.94 gal	
Sodium Nitrate	0.71 cf	A cube approximately 11 inches on each side, or approximately 5 gallons. Equivalent weight = 100 pounds.
Sodium Sulfate	—	Not reportable to regulatory agencies

REPORTABLE QUANTITIES FOR COMMONLY USED CHEMICALS/HAZARDOUS SUBSTANCES		
Chemical/Hazardous Substance Name	**Quantity of Chemical/Hazardous Substance to be Reported**	**Notes**
Sodium Sulfite	—	Not reportable to regulatory agencies
Stoddard Solvent (Mineral Spirits)	1.52 gal	
Sulfuric Acid (100%)	6.5 gal	
Toluene	0.14 gal	18 fluid ounces
1,1,1-Trichloroethylene	0.08 gal	10 fluid ounces
Trichlorotrifluoroethane (see Freon 113)		
Trizol Creep	2.37 gal	
Turpentine	13.81 gal	

Note 1: Ethylene glycol releases from motor vehicles (including small amounts to soil) that are contained, and ethylene glycol releases from stationary sources that are contained on an impervious surface, which are cleaned up within 2 hours of discovery are not reportable to CIG or NYSDEC. Ethylene glycol releases that can not be contained and cleaned up within 2 hours, and all ethylene glycol releases greater than the reportable quantity (RQ) that reach, or have the potential to reach sewers, waterways, groundwater, etc. must be documented within e2MIS and reported to CIG, and subsequently, to NYSDEC.

Note 2: Small releases (less than 50 pounds) of chlorodifluoromethane or difluorochloromethane (Freon 22) are not reportable to CIG or NYSDEC, but must be documented in e^2MIS for inclusion in an annual report to NYSDEC, as required. Individual releases of 50 pounds or more of Freon 22 are reportable to CIG and NYSDEC.

Note 3: All hazardous waste spills are reportable to CIG. A decision will be of what agencies, if any, must be notified. Telephone notifications are required if the spill threatens human health or the environment off Con Edison property, if it enters sewers or waterways, or is released to the environment at or above the RQ for the chemical components of the waste. Additional notifications may be required for PCB-hazardous wastes.

Note 4: The RQ for mercury is 1 pound or 1.28 fluid ounce. However, under an with agreement with NYC, the DEP will be notified of all mercury spills not on Company property (e.g., within customer premises), regardless of quantity.

Note 5: Small aerial cable leaks (less than 0.5 gallon) containing less than 50 parts per million (ppm) polychlorinated biphenyls (PCBs) and that do not enter sewers or waterways are not reportable to CIG or NYSDEC. These types of spills must, however, be documented within e^2MIS for inclusion in an annual report to NYSDEC, as required.

Note 6: Pentachlorophenol (PCP) releases of less than 1 pound that do not enter a waterway, and do not have the potential to enter a waterway are not reportable to CIG and/or NYSDEC, but must be documented in e^2MIS for inclusion in an annual report to NYSDEC, as required. All PCP releases that enter, or have the potential to enter a sewer or waterway, and releases of 1 pound or more to land are reportable to CIG and the NYSDEC hotline.

Note 7: The RQ of 0.08 gallons (10 fluid ounces) for PCBs is based on the release of pure PCBs. The RQ for lower PCB concentrations will be higher. The lowest regulatory RQ for PCBs is one pound. In order to reach one pound of PCBs at 500 ppm PCBs, the release volume would have to be about 260 gallons; at 50 ppm, the release volume would have to be about 2,600 gallons. Refer to PCB CEP 06.08 for additional information concerning PCB spill and fire reporting.

Note 8: The RQ is any quantity for PCB wastes, including wastes with an actual PCB concentration < 50 ppm. **ALL** spills of waste from a PCB tanker, PCB waste drum, PCB waste tank or PCB waste equipment are spills of PCB waste and, therefore, subject to this RQ, unless the spill is **KNOWN** to contain < 2 ppm PCBs in oil or < 0.5 micrograms per liter PCBs in water.

E2MIS INCIDENT # _____ SITE: _____

Release to Waterway or Sewer
Report to CIG Immediately 212-684-2030

DeMinimus ☐ **Odor** ☐ **Sheen** ☐ **Historic Spill** ☐ **New Spill** ☐

Call Received: Date - _____ Time - _____ **Recorded By:** _____ Emp # _____

Reported By: _____ Emp # _____

Finder: _____ Emp # _____ Dept: _____ Phone #: _____

Spill Discovered: Date: _____ Time: _____ **Active Fire/Smoke:** *Yes No*

Location/Facility: _____ **Structure / Pole / Vehicle #** _____

Sewer / Water Affected: Yes No Not Verified ***Date & Time Release to Sewer/Waterway verified***: _____

Reason for entering site/structure: Inspection Maintenance Repairs Emerg Other: _____

On Site: ERT EH&S DEP DEC USCG Police Fire Dept Muni Rep Other: _____

➢ *Spill* - Circle choices where appropriate

Substance: *Antifreeze Asbestos Autoseal Chemical Condensate Dripwater Fuel Hydraulic Insulatum Mercury Odor Only Trans Fdr Fluid Unk Substance* (***Oil*** → *Cable Heating Jt Reservoir Lube Motor Transf Unk)*

Other: _____ **Amount Spilled:** Substance Amount: _____ Water Amount: _____

Where applicable: Drip Rate of Equipment Leaking: _____ **per** _____ **Feeder:** _____

Source Of Spill: *Cable Gas Pipe Joint Jt Reserv Regulator Tool Transf Trans Fdr Unk Vehicle*
Other: _____

Cause of Spill: *Smoke/ Fire Equip Failure Leak Damaged Equip 3rd Party Oper Error Unknown* Other: _____

Spilled on? *Concrete Asphalt Bluestone Soil Water Person Unknown* Other: _____

Private Property Affected? *None Building Vehicle Property Personal Articles* Other: _____

Details: _____

Substance Owned by: *Con Ed* ☐ *3rd Party* ☐ *Not Verified* ☐ Name of 3rd Party: _____

➢ *Structure* - *Circle choices where appropriate*

Not Applicable: ☐

Oil filled Equipment in Structure? *Yes No Not Verified* **Askarel components involved?** *Yes No Not Verified*

Environmental Yellow Tag # _____ **Conduit Plate #:** _____

Standing Water? *Yes No Not Verified* **Visual Water Movement?** *Yes No Not Verified*

Sewer Connection? *Yes No Not Verified* → If Yes, entered source of Information: _____

Concrete Sump? *Yes No Not Verified* **Sump Pump Running?** *Yes No Not Verified*

Earthen Sump? *Yes No* **Any Substantial Cracks?** *Yes No*

Parking / Access: _____ **Dielectric-filled feeder in structure?** *Yes No Not verified*

■ *Notification*

CIG Notified: Date: _____ Time: _____ **Not Applicable:** ☐

Any delays contacting CIG? ◯ # of Attempts ___ Name: _____ Emp # _____

➢ Sample - *Circle choices where appropriate*

Not Applicable: ☐

Type of Sample Taken? *PCB ID None Other:* _____

Sample Taken from: *Source Waste Spill*
Always attempt to take sample from source.

Sampled By: _____ Emp # _____

Chain of Custody # _____

Sample Priority: _____ **Type of Sample:** *Liquid Solid Soil Bluestone Sludge Wipes (Lab Only)*

Current or Historic Sample: PCB's _____ PPM **Lab Seq #** _____ Date: _____
Sample to be taken: _____ **Cleanup Pending Sample Results?** *Yes No*

➢ Cleanup - *Circle choices where appropriate*

Not Applicable: ☐

Initial Cleanup Action Taken: _____

Started: Date - _____ Time - _____

Completed: Date - _____ Time - _____ **Spill Tag Removed:** *Yes No NA*

Cleanup Supv: _____ Emp # _____

Cleanup Persons: _____ Emp # _____
_____ Emp # _____
_____ Emp # _____

➢ Sampling Identification - *Circle choices where appropriate*

Not Applicable: ☐

# of Samples Taken: _____ **Locations:** _____

Collection Method: _____ **Sample Analytical Method:** _____ **VOC/SVOC Sampling:** *Yes No*

Temp/Perm EPA #: _____ **Lab Results:** _____ **Chain of Custody Completed?** *Yes No*

➢ Equipment - *Circle choices where appropriate*

Not Applicable: ☐

Serial # _____ **Mfr:** _____ **Yr of Mfr:** _____ **PCB Name Plate Data:** _____

Fluid Capacity: _____ Gallons - **Fluid Remaining:** _____ Gallons = Difference: _____ Gallons

Pressure Tested: *Yes No* **Pressure Test:** *Passed Failed* **Equipment Replaced:** *Yes No*

Equipment Repaired: *Yes No* **Engineering Control In Place:** (Describe) _____

➢ Waste Management - *Circle choices where appropriate*

Not Applicable: ☐

PCB Waste Generated: Less Than 50 PPM *Solid Liquid* Amount: _____
50 to 499 PPM *Solid Liquid* Amount: _____
500 PPM or greater *Solid Liquid* Amount: _____

Waste transported to: _____

➢ Post Cleanup Investigation - *Circle choices where appropriate*

Not Applicable: ☐

Sump Examined? *Yes No* **Sump Cracked?** *Yes No* **Sump Lined?** *Yes No*

Piping / Conduit / Duct Examined? *Yes No* **Post Cleanup Wipe Samples Taken?** *Yes No*

Refer to EH&S for Remediation: *Yes No*

Comments: _____

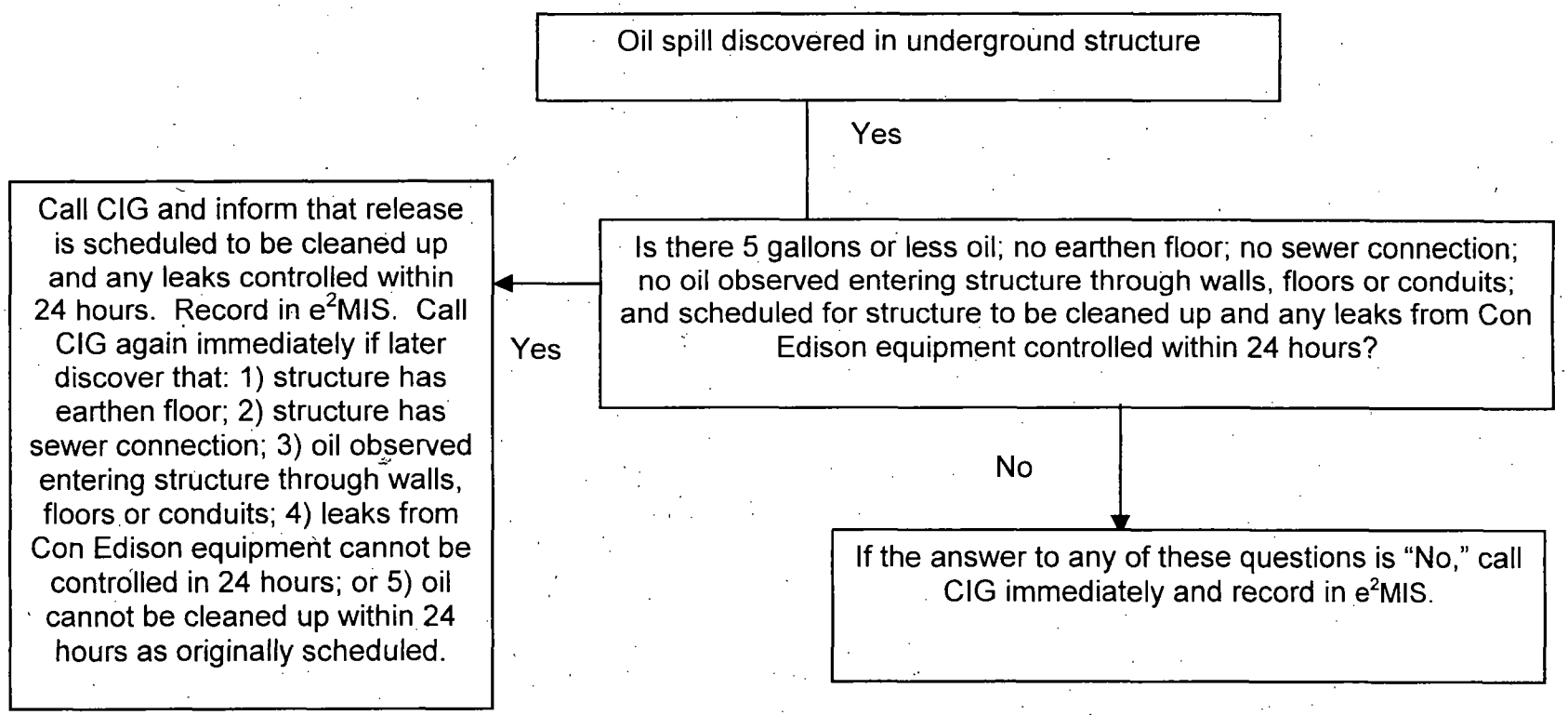
ATTACHMENTS 02.01-3 THROUGH 02.01-5

FLOW CHART SUMMARIES OF REPORTING OBLIGATIONS RELATING TO PETROLEUM PRODUCT AND HAZARDOUS SUBSTANCE RELEASES

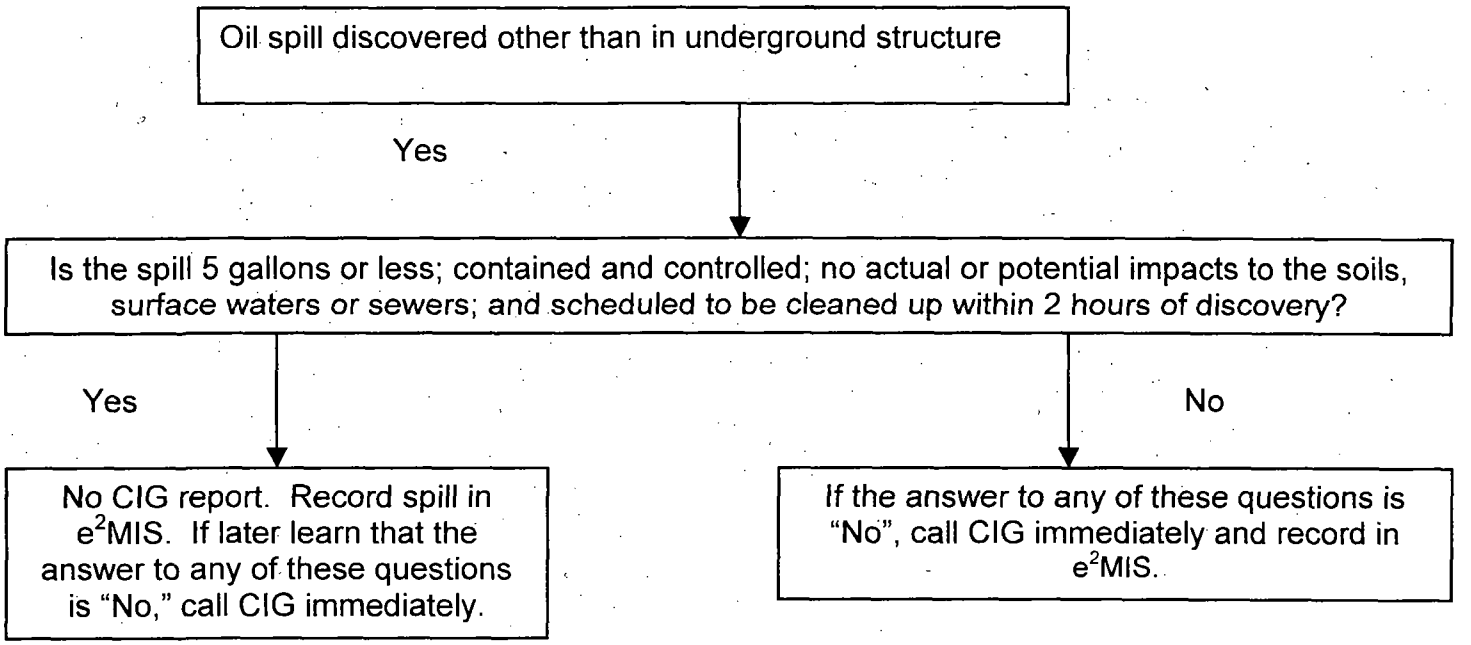
Attachment 02.01-3 below is a flow chart that summarizes Con Edison personnel's reporting requirements for spills of petroleum products in underground structures. Attachment 02.01-4 is a flow chart that summarizes reporting requirements for spills of petroleum products other than in underground structures. Attachment 2.01-5 is a flow chart that summarizes reporting requirements for releases of hazardous substances.

Both attachments 02.01-5 and the appropriate attachment (02.01-3 or 02.01-4) for petroleum releases may apply if petroleum containing PCBs and/or benzene is released.

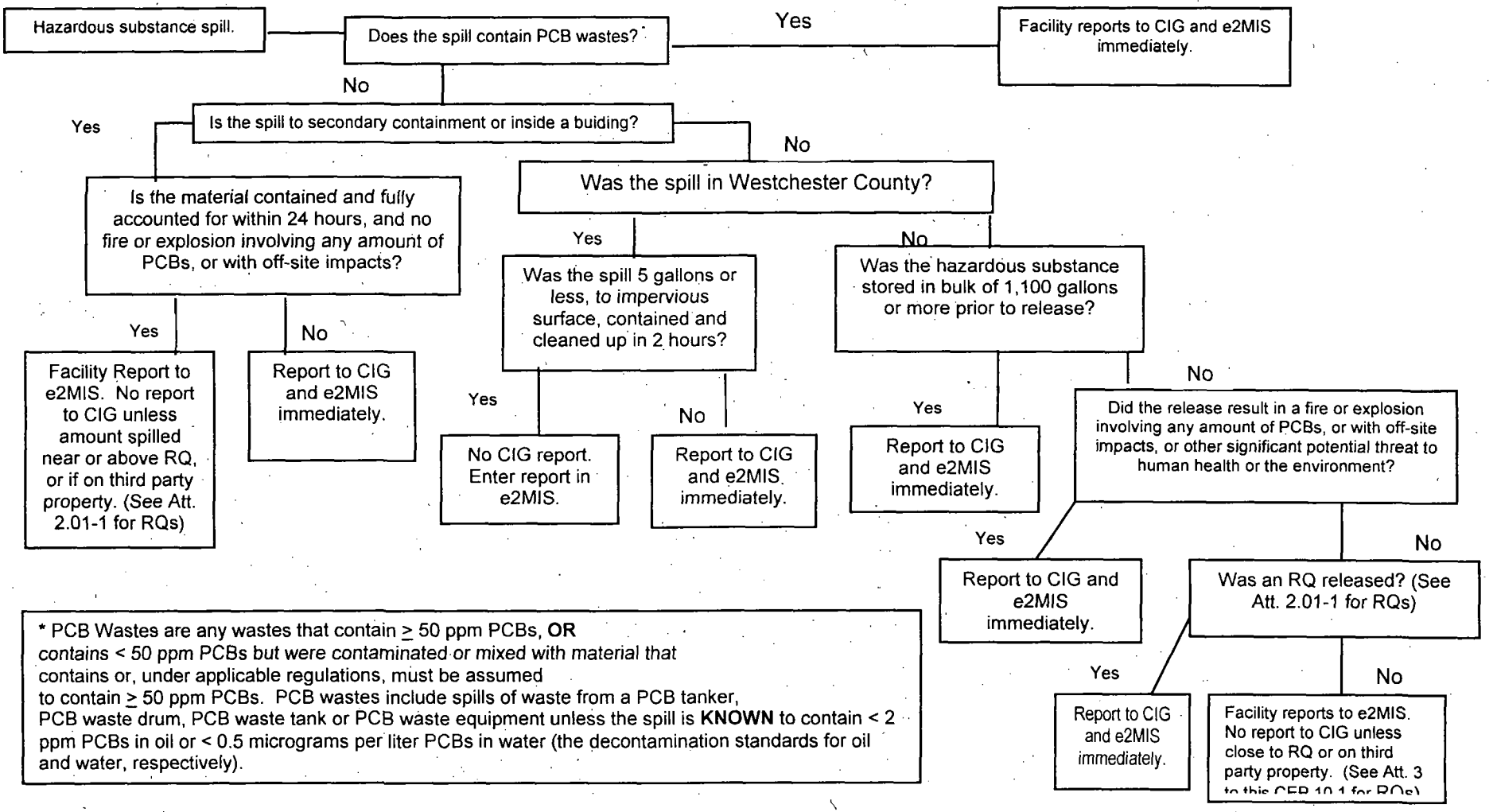
ATTACHMENT 02.01-3:
SUMMARY OF REPORTING REQUIREMENTS APPLICABLE TO OIL IN UNDERGROUND STRUCTURES



ATTACHMENT 02.01-4:
SUMMARY OF REPORTING REQUIREMENTS FOR OIL SPILLS OTHER THAN IN UNDERGROUND STRUCTURES



ATTACHMENT 02.01-5:
SUMMARY OF THE HAZARDOUS SUBSTANCE RELEASE REPORTING REQUIREMENTS



* PCB Wastes are any wastes that contain ≥ 50 ppm PCBs, **OR**
contains < 50 ppm PCBs but were contaminated or mixed with material that contains or, under applicable regulations, must be assumed to contain ≥ 50 ppm PCBs. PCB wastes include spills of waste from a PCB tanker, PCB waste drum, PCB waste tank or PCB waste equipment unless the spill is **KNOWN** to contain < 2 ppm PCBs in oil or < 0.5 micrograms per liter PCBs in water (the decontamination standards for oil and water, respectively).

GEI 2.23– Cleanup Of Mercury Spills
Section 2.00 - Spill Response and Cleanup

IDENTIFICATION

This GEI describes the procedures to control and clean up spills of mercury from equipment such as gas regulators, thermostats, manometers, etc. Refer to GEI 6.03 for guidance in the cleanup of broken fluorescent lamps containing mercury.

PREPARATION

- To select training applicable to job-specific conditions associated with this GEI, refer to Appendix A, Selection of Job-Specific Training Requirements.
- Obtain the following equipment as required:
  - 5-gallon plastic bucket with cover (C/S No. 025-3229).
  - 20-gallon plastic container (C/S No. 025-3211).
  - 55-gallon steel drum with lid (C/S No. 025-2692).
  - Containment pads.
  - DOT Class 8 labels.
  - Hazardous waste shipping labels, yellow.
  - Heavy-duty plastic trash bags.
  - Plastic sheeting (6-mil) cut to form a sheet.

PERSONAL PROTECTIVE EQUIPMENT

- Before beginning work, determine what potential hazards may exist and select the appropriate level of protection necessary. Refer to the Hazard Assessment Flow Diagram presented in Appendix B to select the proper personal protective equipment (PPE) based on potential hazards at the work site.

NOTE: See your supervisor if you are not sure of the selection of proper PPE.

- Additional PPE required for this task may include:
  - Polyethylene-Coated Coveralls (if replaced within 20 minutes of contaminant contact).
  - Saran-Coated Coveralls.
  - Work Gloves.
  - Vinyl Disposable Cover Boots.
  - Neoprene Gloves (heavy-duty).
  - Respiratory Protection (if applicable).

REPORTING

When a mercury spill occurs off the containment pad, report the spill per GEI 2.01. For mercury spills, in addition to the notifications identified in GEI 2.01, the Central Information Group (CIG) or the Local Control Center (for Gas) will also contact Industrial Hygiene and Astoria ChemLab personnel to mobilize to the site to monitor and clean up the spill. At the Indian Point Station, all mercury spills are to be reported to the Central Control Room, which will immediately contact the Radiation Waste Department's Hazardous Material Cleanup (HazMat) Team. The Indian Point HazMat Team has the required training, equipment and operating procedures to cleanup mercury spills and prepare waste for disposal.

SPILL CLEANUP PROCEDURE

Do not attempt to clean up the mercury spill or recover the spilled mercury. ChemLab personnel are responsible for spill cleanup. (At Indian Point, the HazMat Cleanup Team is responsible for mercury spill cleanup.)

- Prevent the spread of the spill and vapors by cordoning off the area to restrict movement through the spill area.
- Cover the spilled mercury with plastic bags or sheeting until ChemLab (or Indian Point HazMat) personnel arrive at the scene.
- In the spill occurs indoors, ventilate the area. Open windows where practicable. If central heat, air-conditioning or central ventilation fans are in operation, turn off the units where practicable to prevent the travel of mercury vapors through the premises.
- Restrict access of nonessential personnel to the immediate spill area until ChemLab (or Indian Point HazMat) personnel arrive.
- Con Edison personnel must wait at the scene until ChemLab (or Indian Point HazMat) personnel arrive. If a Gas Construction crew was present at the time of the spill, the Gas Control Center will dispatch a Gas Distribution Services Supervisor and Mechanic to relieve the Construction crew.
- Refer to GEI 6.06 for labeling, handling, transportation, and disposal procedures for the spill cleanup materials.

LABELING AND HANDLING

- If the mercury waste is generated at a manned Con Edison facility:
  - Place the waste in a bucket or drum and tightly seal the container.
  - Label the container per GEI 6.15.
  - Transfer the container to the facility's central hazardous waste storage area.
  - At Indian Point the HazMat Team will manage all mercury waste under conditions specified in Indian Point's NYSDEC Hazardous Waste Management Permit.
- If the mercury waste is generated at a field location or unmanned Con Edison facility:

  - Place all mercury waste into a bucket or drum, tightly seal the container, and remove the waste to your vehicle.
  - Place a yellow hazardous waste shipping label on the container, and mark the label with the current date and the following information:

    RQ Waste Mercury, 8, UN 2809, PG III
  - Place a DOT Class 8 label on the container.
- Broken mercury thermostats must be handled and labeled as mercury hazardous waste per the procedures described above. Unbroken mercury thermostats can be handled as universal wastes. Place unbroken thermostats in the designated universal waste drum at your facility, service center, or workout location.
- Broken and unbroken instrument controls containing mercury, such as float switches on sump pumps in transformer vaults, must be labeled and handled as mercury hazardous waste.

TRANSPORT AND DISPOSAL

The procedure for the transport and disposal of mercury spill waste from an unmanned Con Edison facility or field location is similar to that for gas regulators containing mercury. Refer to GEI 6.06 for guidance.

RECORDING

Forward a copy of the shipping paper and manifest or Land Disposal Restriction (LDR) form to your immediate supervisor. These records must be filed by the appropriate operating department.

GAS OPERATIONS INTERIM PROCEDURE

GEI 6.06 – Removal, *Spill Response*, Storage And Disposal Of Gas Regulators And Other Mercury-Containing Equipment
Section 6.00 - Hazardous Waste Management

IDENTIFICATION

This instruction describes the special precautions that must be followed when handling natural gas regulators and other mercury-containing equipment. Mercury is a hazardous material that can enter the body when vapors are inhaled or when it is absorbed through the skin.

Note: The containment, set-up and work procedure requirements of this GEI apply to all service regulator removals and associated vent piping, including spring regulators. If you find mercury during a spring regulator removal (i.e. – in a vent line) the remainder of this GEI also applies.

PREPARATION

- To select training applicable to job-specific conditions associated with this GEI, refer to Appendix A, Selection of Job-Specific Training Requirements.
- Obtain Mercury Spill Prevention Kit (in 5 gallon bucket C/S No. 638-1677)
  - Replacement kit (in plastic bag C/S No. 638-1669)
  - Other items you may need include:
  - 5-gallon plastic container with cover (C/S No. 025-3229).
  - 15-gallon plastic container with cover (C/S No. 025-3203)
  - 20-gallon plastic container (C/S No. 025-3211).
  - 55-gallon steel drum with lid (C/S No. 025-2692).
  - Mercury Spill Pad (MSP) 30" x 48" (C/S No. 689-3382)
  - Absorbent Pads 17" x 19" (C/S No. 638-1412)
  - Department of Transportation (DOT) Class 8 labels. (C/S No. 659-5128)
  - Hazardous waste shipping labels, yellow. (C/S No. 024-6595)
  - Corrugated orange drum liner (C/S No. 025-3732)
  - Thin plastic bag (to protect drum liner) (C/S No. 025-1397)
  - Heavy-duty plastic bags. (C/S No. 025-3377)

PERSONAL PROTECTIVE EQUIPMENT

- Before beginning work, determine what potential hazards may exist and select the appropriate level of protection necessary. Refer to the Hazard Assessment Flow Diagram presented in Appendix B to select the proper personal protective equipment (PPE) based on potential hazards at the work site.

NOTE: See your supervisor if you are not sure of the selection of proper PPE.

- Additional PPE required for Mercury Regulator removal:
  - Heavy Duty Nitrile Gloves
  - Vinyl Disposable Boot Covers (booties)

REGULATOR REMOVAL PROCEDURE

- Visually Inspect area in the vicinity of regulator and inspect outside area under the vent cap. Removal shall not proceed if any hazards are found upon initial inspection.
- Any mercury found shall be reported immediately to your supervisor and work shall not proceed.
- Clear area around regulator of storage items, debris or other obstacles. (Do not sweep area.)
- Ensure a complete shutdown of the gas service.
- Using the contents of the spill prevention kit, set-up the containment area using enough Mercury Spill Pads (MSP's) to cover the floor and wall area. The MSP's shall provide sufficient coverage to be under the section of the vent line and regulator that is going to be removed.
- Tape the MSP's to the floor and wall. The MSP should extend vertically and beyond the regulator horizontally to ensure sufficient protection for containment. Curve up the edges of the pad to trap any mercury that may accidentally be released during removal process. Leave the pad in place until the new regulator and vent line are connected.
- Don your PPE (Gloves, booties)
- Place the drum liner (lined with the thin plastic bag) directly under the area in which you are working. If the drum liner can't be used due to tight clearances your containment must be modified to provide sufficient protection to prevent a spill. Contact Your Supervisor or Environmental Coordinator as needed.
- Place a heavy-duty plastic bag in your 5-gallon bucket for pipe removal. Have this inside your containment area.
- Tap on the vent line to dislodge any mercury.
- Separate and disconnect Vent line.
- Disconnect the vent piping from the regulator. Check the vent line for the presence of mercury. If possible, pitch the vent line down to remove any mercury trapped in the vent line and tap the vent line. This must be done over your bucket.
- Place the removed vent line into the heavy-duty plastic disposal bag.
- Temporarily duct seal or tape the open end of the vent line.

- Tightly plug the vent line opening on the regulator body.
- Disconnect and remove the regulator outlet piping and tightly plug the regulator opening.
- Place the regulator outlet piping into your heavy-duty plastic bag.
- Carefully unscrew the regulator body from the inlet piping, and tightly plug the openings on the regulator and the gas line. If the regulator cannot be turned in place, the regulator must be removed by cutting the inlet piping with a pipe cutter.

⇒ Plug or cap all openings "gas tight." To avoid spills, plug the regulator openings while the regulator is still in place.

- Place the regulator in the heavy-duty plastic bag.
- Where practical, remove vent line to first vertical fitting, being sure matting and the drum liner are under the vent piping you are working on.
- Any gas pipe or fittings that have come in contact with mercury shall be placed directly into the heavy-duty plastic bag and tied off.
- Continue with the installation of the new regulator and piping. If you need to leave the containment area, remove your booties to prevent the possible tracking of mercury. Prior to re-entering the containment area put on booties.
- Place the bagged regulator in a second heavy-duty plastic bag and tie off.
- When the job is complete and the new regulator has been installed, all associated containment material and PPE used on the job are to be disposed of along with the mercury regulators and pipe or fittings as mercury hazardous waste.
- Place the double-bagged waste into the disposal bucket (drum) prior to leaving the regulator work area.
- Upon completion of the removal, the area shall be visually inspected.

Note 1: All waste should be transported double-bagged and sealed in a DOT-approved container. If you suspect that any mercury has leaked inside the pail, the pail should also be disposed of as mercury hazardous waste.

Note 2: If the mercury regulator is installed in a pit outside the customer's premise, look for external mercury seal or relief on the customer's piping. If you identify a mercury relief, contact your Supervisor and Gas Environmental Coordinator for assistance in removing this device.

When a mercury spill occurs off the containment pad, report the incident to your supervisor. You or your supervisor shall notify the local Control Center, (if applicable) who will immediately contact Central Information Group (CIG) to make the proper notifications. Your local Control Center shall call CIG and the Chemlab personnel to mobilize to the site to monitor and clean up the spill.

SPILL RESPONSE PROCEDURE

- Do not attempt to clean up the mercury spill or recover the spilled mercury. Chemlab personnel are responsible for spill cleanup.
- Notify customer not to enter area of spill until cleared by Chem. Lab personnel.
- Prevent the spread of the spill and vapors by cordoning off the area to restrict movement through the spill area.
- Ventilate the area. Open windows where practicable.
- Cover the spilled mercury with heavy-duty plastic bags until Chemlab personnel arrive at the scene.
- If you need to leave the immediate area where the spill occurred, remove your vinyl booties and leave them in the area of the spill (put them in the plastic bag if possible). It is important to restrict the area in which you are walking to minimize the possible spread of mercury.
- If central heat, air-conditioning or central ventilation fans are in operation, turn off the units where practicable to prevent the travel of mercury vapors through the premises.
- Gas Operation personnel must wait at the scene until Chemlab personnel arrive. Gas Operation personnel must assist the Chem. Lab with the clean up and waste removal.

LABELING AND HANDLING

- When the buckets of mercury waste are removed to your vehicle, place a yellow hazardous waste shipping label on the container, and mark the label with the current date and the following information:
  RQ Waste Mercury, 8, UN 2809, PG III
- Place a DOT Class 8 label on the container.
- Do not leave the mercury hazardous waste unattended at the job site. The waste must be properly shipped off-site by a Con Edison vehicle or an approved disposal vendor.

TRANSPORT AND DISPOSAL

Transportation and disposal requirements will depend on the quantity of mercury-contaminated regulators and other hazardous waste that is generated at each location per calendar month. If less than 220 pounds of mercury-contaminated regulators and other hazardous waste (including drip water) is generated at a single location per calendar month, then the location is classified as a conditionally exempt small-quantity generator (CESQG). If greater than 220 pounds of mercury-contaminated regulators and other hazardous waste (including drip water) is generated at a single location per calendar month, then the location is classified as a small-quantity generator (SQG).

THREE OPTIONS ARE AVAILABLE TO DISPOSE OF MERCURY-CONTAMINATED REGULATORS

- Option No. 1: Transportation of regulator(s) from a single location that is classified as a CESQG (that is, one address where less than 220 pounds of mercury-contaminated regulators is generated per calendar month):
  - Carry the double-bagged regulator(s) in a DOT-approved container(s) in a Con Edison crew vehicle.
  - No hazardous waste manifest, United States Environmental Protection Agency (USEPA) ID number, permitted and placarded transport vehicle, or commercial driver's license (CDL) or Part 364 permit is required.
  - A shipping paper as described below must accompany the shipment.
  - No transfers between vehicles are permitted.
  - Deliver the regulator(s) directly to the designated hazardous waste storage area at your service center at the end of your shift, or as an alternative, deliver the regulators directly to an approved disposal vendor (XYZ Waste Disposal Corporation).

⇒ Gas Service Centers may receive hazardous waste such as mercury regulators only from field locations (customer premises) that generate less than 220 pounds of hazardous waste (mercury regulators, drip water, etc.) per calendar month.

- Option No. 2: Transportation of regulators from multiple locations that are classified as CESQGs (that is, multiple addresses where less than 220 pounds of mercury-contaminated regulators is generated at each location per calendar month):
  - Carry the double-bagged regulators in DOT-approved containers in a Con Edison crew vehicle. (One regulator per container)
  - No hazardous waste manifest, USEPA ID number, or placarded transport vehicle is required.
  - No Part 364 permit or CDL is required.
  - A shipping paper as described below must accompany each regulator.
  - No transfers between vehicles are permitted.
  - Deliver the regulators directly to the designated hazardous waste storage area at your service center at the end of your shift, or as an alternative, deliver the regulators directly to an approved disposal vendor.
- For Option Nos. 1 and 2, complete a Stores waste tracking/shipping paper in duplicate with the following information for each location:

From:	Con Edison (Address of customer premises)
Note:	Con Edison is classified as a conditionally exempt small-quantity generator at this address.
Date:	(Date that waste is transported off-site)
Description:	Mercury-Contaminated Gas Regulators
No. of Drums:	(Total number of containers)

Weight: (Estimated weight)
To: Chemical Waste Disposal Corporation (Example Vendor)
42-14 19th Avenue
Astoria, New York 11105
(718) 274-3339
Or: Use your service center address and telephone number when transporting the regulators to your service center.

- Option No. 3: Transportation of regulator(s) from a single location that is classified as an SQG (that is, one location that generates greater than 220 pounds of hazardous waste per calendar month):
  - Carry the double-bagged regulator(s) in DOT-approved container(s) in a vehicle that possesses a New York State Department of Environmental Conservation (NYSDEC) Part 364 waste transporter permit. Either a Con Edison vehicle or a vehicle from an approved transportation vendor must be used.
  - The vehicle must be placarded with DOT Class 8 placards if the vehicle is carrying over 1,001 pounds of hazardous waste.
  - If total hazardous waste is over 1001 pounds, the driver of the vehicle must have a CDL with an H or X endorsement.
  - A temporary USEPA ID number must be obtained for the mercury regulator location. Contact the Control Center to obtain an ID number.
  - A hazardous waste manifest and land disposal restriction (LDR) form must be used. If the vendor completes the manifest and LDR form, the paperwork must be reviewed for accuracy.
  - ⇒ Never manifest regulators to a Con Edison service center. Whenever greater than 220 pounds of regulator(s) is generated at a single location, the regulator(s) must be shipped to an approved disposal vendor. Always complete an LDR form when you use a manifest.
  - Properly completed yellow hazardous waste shipping labels must be used on all waste containers.
  - The vehicle should proceed directly to the approved disposal vendor (for example, Chemical Waste Disposal Corporation in Astoria) after picking up the waste if time permits. If it is late in the day, the vehicle may hold the mercury waste overnight at a manned Con Edison facility. The vehicle is considered to be "out of service". An "out of service" sign must be placed on the steering wheel, and the shipping papers must be placed on the driver's seat. The vehicle must proceed directly to the disposal vendor the next business day. Make arrangements with the vendor to have the container returned or picked up on the next delivery.
  - Transfers between permitted vehicles are allowed, as long as the transfers are documented on the manifest.
  - Additional pickups of any quantity of any type of hazardous waste from the same location in the same month must be manifested to a vendor.

⇒ If regulators from CESQGs and SQGs are transported in the same vehicle, all requirements in Option No. 3 must be followed, except that for the waste from the CESQG locations, a hazardous waste manifest and a USEPA ID number should not be used. A shipping paper as described for Option Nos. 1 and 2 should be used for the CESQG wastes, and a manifest and USEPA ID number should be used for the SQG wastes.

MANAGEMENT OF OTHER MERCURY-CONTAINING EQUIPMENT

- Other mercury-containing equipment must be handled as follows:
  - Instrument controls other than thermostats (for example, float switches on sump pumps in transformer vaults) should be handled as described above.
  - Thermostats containing mercury should be double-bagged and tagged, transported in a DOT-approved container to your service center, and deposited in the universal waste drum at your workout location.

RECORDING

Forward a copy of the shipping paper and manifest or LDR form to your immediate supervisor. The appropriate Customer Service Organization must file these records.

IDENTIFICATION

Special federal and state environmental and transportation regulations apply to the off-site shipment of hazardous waste in drums and in bulk loads. Drums that are shipped off-site for disposal must be properly labeled. Two labels are always required: the yellow hazardous waste shipping label and the diamond-shaped hazard class label. The proper paperwork must be prepared for both drummed and bulk hazardous waste shipments. This paperwork includes a hazardous waste manifest and a land disposal restriction (LDR) form. In addition, vehicles must be placarded as required and must possess the proper permits.

PREPARATION

- To select training applicable to job-specific conditions associated with this GEI, refer to Appendix A, Selection of Job-Specific Training Requirements.
- Obtain the proper equipment as required, for example:
  - DOT hazard class labels.
  - Hazardous waste shipping labels, yellow.

PERSONAL PROTECTIVE EQUIPMENT

- Before beginning work, determine what potential hazards may exist and select the appropriate level of protection necessary. Refer to the Hazard Assessment Flow Diagram presented in Appendix B to select the proper personal protective equipment (PPE) based on potential hazards at the work site.

NOTE: See your supervisor if you are not sure of the selection of proper PPE.

DRUM LABELING

- Ensure that the drums are ready for transport. The drums must be tightly sealed and in good condition (no holes, large dents, bulging, or excessive rust).
- Place a yellow hazardous waste shipping label on the side of each drum over the accumulation label that is already on the drum. The shipping label should be placed on the upper third of the drum. An example of a shipping label is provided as Figure 6.09-1.
- Ensure that the side of the drum where the label is placed is dry and clean so that the label will stick. The label must not be obscured by other labels.
- The label must be in good condition and must be completed in English.

⇒ **The label information may be completed before placing the label on the drum. Use a waterproof marker to ensure that the information does not rub off, wash off, or fade. Do not perform this task unless you have received the proper training.**

- Enter the generator name. Use "Consolidated Edison Co. of New York".

- Enter the generator address, city, state, and zip code. Use the street address where the waste was generated.
- Enter the generator telephone number. Use the Control Center telephone number or the telephone number of the Con Edison facility that is entered in Section 4 of the hazardous waste manifest that will be used to ship the drums off-site.
- Enter the EPA ID number. This ID number is specific to each Con Edison facility. The ID number begins with the letters "NYD" or "NYP" followed by nine numbers. Each facility has already been assigned an EPA ID number. Use the number that is entered in Section 1 of the hazardous waste manifest that will be used to ship the drums off-site.
- Enter the manifest document number. This number consists of five numbers. Use the number that is entered between Sections 1 and 2 of the hazardous waste manifest that will be used to ship the drums off-site.
- Enter the accumulation start date. If the drum was filled in a satellite accumulation area, then this is the date that the drum was completely filled. If the drum was filled in a central storage area, then this is the date that waste was first placed in the drum. Use the date that was entered on the hazardous waste accumulation label that is already on the drum.
- Enter the EPA waste numbers. These numbers are the waste code(s) that are assigned for the waste inside the drum. The waste codes begin with a letter followed by three numbers. Use the waste codes that were entered in Section 1 of the hazardous waste manifest that will be used to ship the drums off-site.
- Enter the DOT proper shipping name and UN or NA number. This name and number are assigned to each type of waste. Use the name and number that were entered in Section 11 of the hazardous waste manifest that will be used to ship the drums off-site.
- Place the appropriate DOT hazard class label on the drum directly next to the yellow hazardous waste shipping label. Examples of hazard class labels are provided as Figure 6.09-2.

SHIPPING REQUIREMENTS

- Ensure that the vehicle is equipped with the proper placards on all sides for wastes such as flammable or corrosive wastes if the total weight of all hazardous wastes is more than 1000 pounds. For DOT Class 9 hazardous materials, the Class 9 placard is not required for drum shipments, but the UN identification number must be displayed for bulk shipments
- Confirm that the transporter is carrying in the vehicle a copy of the transporter's current and valid New York State Department of Environmental Conservation (NYSDEC) Part 364 transporter permit. The permit number must also be displayed on the side of the vehicle.
- Confirm that the transporter is carrying in the vehicle a copy of the transporter's current and valid state transportation permits for each state that the shipment will pass through while en route to the disposal facility.
- Confirm that the transporter is carrying in the vehicle a copy of the latest "Emergency Response Guide", which is a pocket-sized book that describes emergency response procedures.
- The person who is designated and trained to complete and sign hazardous waste manifests must ensure that the information on the manifest and land disposal restriction (LDR) form is correct and complete. A Hazardous Waste Manifest Preparation Checklist is provided as Figure 6.09-3. This optional checklist may be used as a tool to ensure that hazardous waste manifests are properly filled out. This form is not required, and, if used, does not have to be saved or filed.

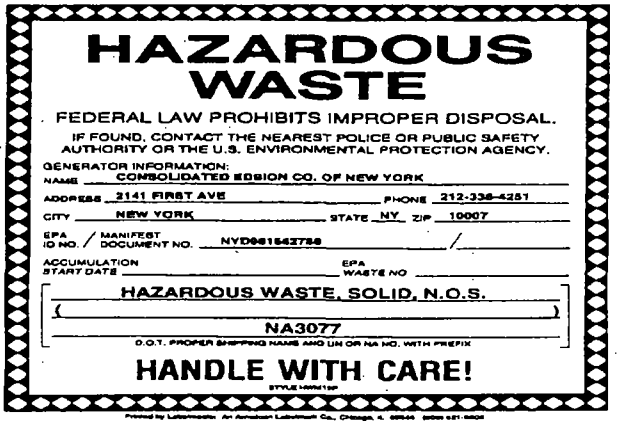
The shipping label information specified above is also required on the hazardous waste manifest and the LDR form.

- The person who is designated and trained to complete and sign hazardous waste manifests must sign the manifest and LDR form.
- Retain the proper three copies of the manifest and one copy of the LDR form and give all other manifest copies and the original LDR form to the transporter.

RECORDING

Forward the three manifest copies and the copy of the LDR form to your supervisor.

FIGURE 6.09-1
EXAMPLE OF HAZARDOUS WASTE SHIPPING LABEL


HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:
NAME CONSOLIDATED EDISON CO. OF NEW YORK
ADDRESS 2141 FIRST AVE PHONE 212-336-4251
CITY NEW YORK STATE NY ZIP 10007
EPA ID NO. / MANIFEST DOCUMENT NO. NYD981542756 /
ACCUMULATION START DATE EPA WASTE NO

HAZARDOUS WASTE, SOLID, N.O.S.
NA3077
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

FIGURE 6.09-2
EXAMPLES OF HAZARD CLASS LABELS
(FLAMMABLE LIQUID LABEL AND CLASS 9 LABEL)

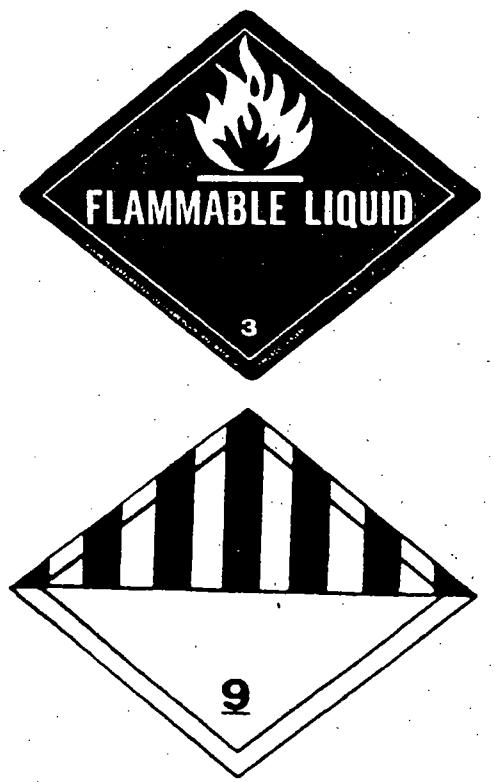


FIGURE 6.09-3
HAZARDOUS WASTE MANIFEST PREPARATION CHECKLIST

This checklist can be used to help assure that the manifest is properly filled out. This form does not have to be used, filed, or saved.

All Drums/Containers Marked With Proper Shipping Name, USDOT Labels _____
Manifest Number Marked On All Hazardous Waste Labels ____

MANIFEST NO. _____

1. Generator EPA ID. No. _____ Five Digit Internal Manifest No. _____
2. Page 1 of _____
3. Generator's Name & Mailing Address ____
4. Generator's Phone No. ____
5. Transporter Co. Name _____
6. Transporter EPA ID. No. _____
7. Transporter #2 Co. Name _____
8. Transporter #2 EPA ID. No. _____
9. Designated Facility Name And Address _____
10. Designated Facility EPA ID. No. _____
11. USDOT Description (word waste must appear as part of DOT name, ex. Waste Mercury) . However, the word waste must not appear if you are transporting PCB's only.
12. Containers No. Containers Type _____
13. Total Quantity _____
14. Units ____
15. Special Handling Addl. Info. ____
    24 Hour Emergency Phone Number ____
16. Generator's Certification _____
    Generator's Signature _____
    Date ____
17. Transporter's Name _____
    Transporter's Signature _____
    Date ____
    A. Manifest Document No. X
    B. State Generator's ID Site Address (same if site addr. = mailing addr.) _____
    C. State Transporter's ID No. _____
    D. Transporter Phone No. ____
    E. Transporter #2 EPA ID., Phone No. ____
    F. Transporter #2 EPA ID., Phone No. _____
    G. (not required by NY, MA, CT, IL, PA) OR NJ (unless waste is sent to waste reuse facility).
    H. Designated Facility Phone No. ____
    I. Waste No. (EPA/State Waste Code) _____
    J. Addl. Descriptions _____
18. Transporter #2 Name _____
    Transporter #2 Signature _____
    Date _____

LAND BAN NOTIFICATION FORM(S)

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IDENTIFICATION

Hazardous waste that is stored in drums must comply with specific federal and state environmental regulations, depending on where the waste is stored.

PREPARATION

- Before beginning work, determine what potential hazards may exist and select the proper level of protection necessary. Refer to the Hazard Assessment Flow Diagram presented in Appendix B to select the proper PPE based on potential hazards at the work site.
- Obtain the proper equipment as required, for example:
  - 55-gallon steel drum with lid (C/S No. 025-2692).
  - 55-gallon steel drum with non-removable head (C/S No. 025-0522).
  - 85-gallon steel overpack drum with lid (C/S No. 025-2262).
  - 55-gallon drum liner (C/S No. 025-3344).
  - 20-gallon lab pack container (C/S No. 025-3211).
  - 5-gallon open-head poly (overpack) pail (C/S No. 025-3195).
  - 5-gallon closed-head poly pail (C/S No. 025-3885).
  - 1-gallon poly containers (C/S No. 025-3393).
  - 1-gallon can (C/S No. 025-0480).

PERSONAL PROTECTIVE EQUIPMENT

- Before beginning work, determine what potential hazards may exist and select the appropriate level of protection necessary. Refer to the Hazard Assessment Flow Diagram presented in Appendix B to select the proper personal protective equipment (PPE) based on potential hazards at the work site.

NOTE: See your supervisor if you are not sure of the selection of proper PPE.

- Additional PPE required for this task may include:
  - Coveralls and Work Gloves.
  - Disposable Coveralls.
  - Polyethylene-Coated Coveralls (if replaced within 20 minutes of contaminant contact).
  - Saran-Coated Coveralls.
  - Rain Jackets and Rain Pants (if inclement weather).
  - Vinyl Disposable Cover Boots.
  - Nitrile Gloves (light-duty).
  - Neoprene Gloves (heavy-duty).
  - Universal Face Shield.
  - Respiratory Protection (if applicable).

WASTE STORAGE

When selecting a drum to store waste, comply with the following procedure:

- Choose the proper drum to store the waste:
  - C/S No. 025-0522: Used for liquid hazardous waste.
  - C/S No. 025-2692: Used for solid hazardous waste.
- Ensure that the drum has no holes, large dents, bulging, or excessive rust.
- Ensure that no unknown liquids or solids are present inside the drum.
- Inspect the gaskets on the bungs and on the removable lid. Gaskets should be present and should not be cracked or dried out.
- Ensure that the drum lid is in good condition and fits tightly on the drum. Avoid using a drum lid from one drum on another drum.

While storing hazardous waste in drums in either a satellite accumulation area or a central storage area, the following requirements must be met:

- Ensure that the drum is properly labeled at all times. Refer to GEI 6.15.
- Ensure that the drum is closed at all times during storage, except when adding or removing waste. If a funnel is used to pour liquid waste into a drum, do not leave the funnel in the bung hole. Remove the funnel after each transfer of waste, and tightly secure the bung into the drum. The funnel may be stored on top of the drum if the funnel is free of waste residues. If the funnel is not free of waste residues, store the funnel in a bucket, but periodically transfer the accumulated waste residues in the bucket to the waste drum.
- Do not open, handle, or store containers in a manner that may cause a rupture or leak.
- If a drum is not in good condition or if it begins to leak, immediately transfer the contents to another container that is in good condition, or place the drum in an overpack drum (C/S No. 025-2262).

⇒ **Ensure that the container used for storage is compatible with the waste stored.** For example, do not place a concentrated acid or caustic solution into a metal drum. Use an approved polyethylene container.

⇒ **Do not place incompatible or different types of wastes in the same container.** For example, do not mix corrosive waste with flammable waste in the same drum.

- Do not place hazardous waste in an unwashed container that previously held an incompatible waste or material.
- Do not store incompatible wastes next to each other. Store containers of incompatible wastes separately by means of a dike, wall, or berm, or on separate spill pallets.
- Avoid storing hazardous waste drums outdoors. Store hazardous waste indoors whenever possible. If the drums are stored outside, cover the drums with a tarp or removable plastic covers to protect them from rainwater.
- Do not store drums near floor drains or storm drains.

NOTE: Whenever hazardous waste is generated at a field location (for example, a street location), do not store the waste at the field location for more than 24 hours. Hazardous waste must never be left unattended at a field location.

NOTE: Any hazardous waste that is generated by the Corporate Medical Van (for example, waste silver nitrate solution) must be left at the Con Edison facility where the van was located when the waste was generated. The facility must properly store the waste in accordance with this GEI, must label the waste per GEI 6.15, must inspect the waste per GEI 6.17, and must ship the waste off-site for disposal per GEI 6.09.

Ensure that the following requirements are met whenever hazardous waste is stored in a central storage area:

- Signs - Ensure that a sign stating "Hazardous Waste" is present. In addition, if ignitable (for example, gasoline or flammable solvents) or reactive waste is stored, ensure that a "No Smoking" sign is present.
- Ignitable/Reactive Wastes - Store ignitable or reactive waste at least 50 feet (15 meters) from the facility property line. In addition, ensure that these wastes are protected from sources of ignition or reaction, such as open flames, smoking, cutting, welding, hot surfaces, sparks, and radiant heat.
- Inspections - Ensure that the storage area is inspected weekly and that the inspection is documented (refer to GEI 6.17).
- Aisle Space - Storage areas must have adequate aisle space around the containers to facilitate inspection and emergency response (if required). If drums are stacked, use pallets between each tier. Do not stack drums more than 2 tiers high.
- Communications Equipment - Ensure that communications equipment, such as a telephone or two-way radio, is located near the storage area in case of an emergency.
- Emergency Response Equipment - Ensure that portable fire extinguishers, fire control equipment (for example, foam, inert gas, dry chemicals), spill control equipment, and decontamination equipment are staged near the central storage area.

If the facility is classified as a large-quantity generator or a small-quantity generator of hazardous waste and the facility is located in Brooklyn or Queens, ensure that the following secondary containment requirements are met whenever greater than 185 gallons of liquid hazardous waste (approximately three and one-half drums) is stored in a central storage area at any time:

- Ensure that the secondary containment for the central storage area is free of cracks or gaps and is able to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.
- Ensure that the containers are elevated (for example, on wooden pallets or spill pallets) or otherwise protected from contact with liquids inside the secondary containment area.
- Ensure that no run-on precipitation can enter the secondary containment area.
- Remove spilled or leaked waste and accumulated precipitation from any sump or collection area in a timely manner to prevent overflow of the containment area.
- If precipitation in the secondary containment area is not visibly contaminated, discharge the water to the storm sewer. If visibly contaminated precipitation or liquid from leaking containers is present in the secondary containment area, then transfer the liquid to a drum. The liquid may have to be managed as a hazardous waste (based on laboratory analysis or knowledge of the waste).

⇒ **It is important that no leaking containers or contaminated rainwater is present in the storage area.**

- If overpack drums are used as secondary containment, ensure that the overpack drums are kept closed and that the drums are marked or labeled the same as the 55-gallon drums inside the overpacks.

Waste Accumulation At Satellite Accumulation Areas At Company Facilities

- One may accumulate less than 55 gallons of hazardous waste at each satellite accumulation area for any length of time. The drum must be labeled with the words "Hazardous Waste" and with other words that identify the contents of the drum (e.g., "Lead-Contaminated Soil"). The drum must remain closed except when waste is added or removed. When 55 gallons of hazardous waste or 1 quart of acute hazardous waste is accumulated at the satellite accumulation area, the drum(s) must be marked with the date on which those limits are reached. This date is known as the *accumulation start date*. The generator then has 3 days to do one of the following:

- Move the waste to the facility's central storage area (if there is one), or

- Ship the waste off-site for disposal.

1.0 PURPOSE

It is the policy of Con Edison to comply with all federal, state, and local regulations pertaining to medical and exposure reporting, notifications, and requests. This procedure was developed in accordance with the Occupational Safety and Health Administration's (OSHA) Access to Employee Exposure and Medical Records Standard (29 CFR 1910.1020). This procedure describes the following:

- Employee notification.
- Requests for ***access*** to exposure records.
- Reporting employee claims of exposure.
- Notification of employees, contractors, and/or the general public following a potential exposure.
- Requests for access to medical records.

2.0 APPLICABILITY

This procedure applies to all current and former Con Edison employees.

3.0 INTRODUCTION

Federal regulations promulgated by OSHA in 29 CFR 1910.1020 require employers to provide employees with information to assist in the management of their own safety and health. The standard "Access to Employee Exposure and Medical Records" (29 CFR 1910.1020) permits direct access by employees or their designated representatives and by OSHA to employer-maintained exposure and medical records.

4.0 COMPLIANCE REQUIREMENTS

4.1 EMPLOYEE NOTIFICATION

Notification of right of access shall be given to all employees as part of the orientation when they first enter into employment with Con Edison and shall be reviewed with current employees at least annually. A "Notice to Employees" (presented in Attachment 1) shall be permanently posted on all Con Edison bulletin boards informing employees of their right of access to relevant exposure and medical records. An annual mailing shall be sent by Environment, Health, and Safety (EH&S) to all employees informing them of their right of access, as well as the location and method of obtaining those records. See Attachment 2 for copy of most recent mailing. Copies of the OSHA standard 29 CFR 1910.1020 and appendices shall be

made available to employees upon request, from the employee's Supervisor or Safety Administrator.

4.2 REQUEST FOR ACCESS TO MEDICAL RECORDS

Con Edison shall provide employees and their ***designated representatives*** access to medical records relevant to the employee. An "Authorization for Release of ***Employee Medical Records***" form (presented in Attachment 3) shall be completed by the employee and submitted to the Safety Administrator or designee. The Safety Administrator or designee shall forward this request form to the Occupational Health Department within two days.

All responses to requests for medical records shall be made within 15 working days of receipt. If access can not be provided within 15 days after the employee's request, Con Edison shall state the reason for the delay and the earliest date when the records will be made available. Responses to the requests for medical records shall be sent to the employee's home, doctor, or designated representative as indicated on the request form. Copies of the medical record shall be given only to the employee or designee.

The initial copy of a medical record shall be provided at no cost to the employee. Subsequent requests for new or additional data shall also be provided free of charge. Employees shall be charged administrative fees (search and copying expenses) for requests for additional copies of information previously provided at no cost.

Medical records shall be kept by Con Edison for at least the duration of employment plus 30 years.

4.3 REQUEST FOR ACCESS TO EXPOSURE RECORDS

Upon request, Con Edison must provide access to ***employee exposure records*** to the employee or the employee's designated representative. To obtain access, the employee or designee shall complete the "Request for Exposure Records" form (presented in Attachment 4) and submit this document to the Safety Administrator. This form can be acquired from the employee's Supervisor or Safety Administrator. The Safety Administrator shall forward the request form to EH&S.

If no personal records exist, EH&S shall provide personal monitoring records of other employees with job duties similar to those of the

employee. If no personal monitoring records exist, results of area sampling shall be provided.

All responses to requests for exposure records shall be made within 15 working days of receipt. If access can not be provided within 15 days after the employee's request, EH&S shall state the reason for the delay and the earliest date when the records shall be made available. Responses to the requests for exposure records shall be sent to the employee's work location. Copies of the exposure data and the response letter shall be forwarded to the Safety Administrator.

The initial copy of an exposure record shall be provided at no cost to the employee. Subsequent requests for new or additional data shall also be provided free of charge. Employees shall be charged administrative fees (search and copying expenses) for requests for additional copies of information previously provided at no cost.

Exposure records and data analyses based on them shall be kept by EH&S for 30 years. Background data for exposure records such as laboratory reports and work sheets shall be kept for only 1 year. Records of employees who have worked for less than 1 year are not required to be retained after employment. If Con Edison chooses not to retain exposure records for employees who have worked less than 1 year, the records shall be given to the employee upon termination of employment.

4.4 REPORTING EMPLOYEE CLAIMS OF EXPOSURE

Any employee who believes that he or she may have been exposed to a material that he or she wishes to have documented may report the incident to his or her supervisor. Upon notification by an employee of a claimed exposure, the Supervisor shall notify the Safety Administrator (during normal working hours) or the Shift Supervisor (during off-shifts). The Supervisor shall then provide the employee with an "Employee Report of Incident" form to be completed by the employee (presented in Attachment 5). All requests for such forms shall be made in a timely fashion, as soon as possible after a claimed exposure. The completed form shall be returned to the Supervisor, who will forward it to the Safety Administrator.

- Where necessary, an investigation of the alleged exposure shall be conducted.

An Employee Report of Incident shall be generated by the Supervisor, Safety Administrator, or the Shift Supervisor. The original report shall be sent to the Occupational Health Department for inclusion in the employee's Occupational Health Record. This incident report should not be considered an admission by Con Edison that the employee has in fact had the claimed exposure or that claimed exposure constitutes a health risk.

4.5 NOTIFICATION OF EMPLOYEES FOLLOWING POTENTIAL EXPOSURE

The Supervisor shall inform Con Edison employees (including per diem employees) in his or her work group of potential exposures to contaminants by posting and/or providing written reports of area and/or personal monitoring and any environmental testing data to all employees who may have had potential exposure to contaminants.

4.6 NOTIFICATION OF CONTRACTOR EMPLOYEES FOLLOWING POTENTIAL EXPOSURE

The Con Edison supervisor shall provide the contractor supervisor with area and/or personal monitoring results and any environmental data including bulk, wipe, or soil sampling results pertaining to the potential exposure. The contractor supervisor shall be advised to post and/or provide these data to affected contract employees who may have had potential exposure

4.7 NOTIFICATION OF MEMBERS OF PUBLIC FOLLOWING POTENTIAL EXPOSURE

A member of the public shall include any person who is not a Company employee or the employee of a contractor or subcontractor working for Con Edison. This includes employees of other companies or utilities, the general public, and residents of the immediate area who may have had potential exposure.

4.7.1 Notification of Non-Con Edison Employees

In situations involving non-Company or non-contractor employees, a management employee shall be designated to act as a liaison with a representative of the affected company or civil agency and provide the company with area and/or personal monitoring results and any environmental data including bulk, wipe, or soil sampling results pertaining to the potential exposure. The representative shall be

advised to post and/or provide this information to affected employees who may have had potential exposure.

4.7.2 Notification of Residents

In situations involving members of the public, a management employee shall be designated to act as a liaison with the affected residents and provide them with pertinent information concerning the potential exposure to a contaminant. Area and/or personal monitoring results and any environmental data including bulk, wipe, or soil sampling results shall be made available to residents upon request.

5.0 DEFINITIONS

Access: Right and opportunity to examine and copy.

Designated Representative: Any individual or organization to whom an employee gives written authorization to exercise a right of access. For the purposes of access to employee exposure records and analyses using exposure or medical records, a recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.

Employee Exposure Records: A record containing any of the following kinds of information:

- Environmental (workplace) monitoring or measuring of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other form of sampling.
- Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems.
- Material safety data sheets (MSDSs) indicating that the material may pose a hazard to human health.

Employee Medical Records: A record concerning the health status of an employee which is made or maintained by a physician, nurse, or other health care personnel or technician, including:

- Medical and employment questionnaires or histories.
- The results of medical examinations and laboratory tests.
- Medical opinions, diagnoses, progress notes, and recommendations.

- First aid records
- Description of treatments and prescriptions.
- Employee medical complaints.

6.0 RESPONSIBILITIES

Employees: The employee is responsible for following the requirements of the medical and exposure reporting, notifications, and requests procedure.

Environment, Health, and Safety (EH&S): EH&S performs the following functions:

- Reviews applicable regulations and ensures that procedures meet all regulatory requirements.
- Revises procedures as applicable.
- Reviews/approves controlled documents prior to release.
- Distributes updates and changes.
- Reviews training prepared by the Learning Center.
- Provides technical assistance to Safety Administrators.

Facility or Site Manager Responsible for Compliance: The Con Edison designated individual within each operating organization who is responsible for ensuring compliance with federal, state, and local regulations, and this procedure.

Law Department: The Law Department shall assist and provide guidance to EH&S by reviewing changes to these procedures in light of all applicable statutes and regulations to ensure that the procedures meet all legal requirements.

Learning Center: The Learning Center and Operating Organizations are responsible for developing, reviewing, and assisting in OSHA-required training. The Learning Center will maintain records of training.

Operating Organizations: Unless otherwise indicated, operating organizations (Customer Service, Electric, Fossil, Gas, Purchasing and Stores, Steam, and Systems & Transmission Operation [S&TO])

must designate a representative responsible for compliance with federal, state, and local regulations, and this procedure.

7.0 REFERENCES

Federal:

Title 29, Code of Federal Regulations, Part 1910.1020 - Access to Employee Exposure and Medical Records.

ATTACHMENT 1

NOTICE TO EMPLOYEES

Information on employee exposure to hazardous substances, harmful physical agents and results of any personal and area monitoring performed for exposure to hazardous substances can be obtained by submitting a "Request for Employee Exposure Records". Information on individual occupational health/medical records can be obtained by submitting an "Authorization for Release of Employee Medical Records". These forms are available from your supervisor or safety administrator.

Copies of OSHA standards and appendices are available in the office of the safety administrator.

SUBJECT

SECTION
MEDICAL AND EXPOSURE REPORTING, NOTIFICATIONS, AND REQUESTS

ATTACHMENT 2
ANNUAL MAILING

FOR CON EDISON EMPLOYEES

ITEMSOFINTEREST

PREPARED BY EMPLOYEE COMMUNICATIONS, 460-4106

NO. 648

Employees Have Right to Access Medical And Exposure Records

All Con Edison employees and their designated representatives have the right of access to all relevant exposure records and their own medical records.

Exposure records are maintained by Environment, Health, and Safety, and may be obtained by submitting a completed "Request For Exposure Records" form to the Industrial Hygiene and Safety Services Section, 4 Irving Place, Room 828, M020. Blank forms are available from your supervisor or safety administrator.

Medical records are maintained by the Occupational Health Department and may be obtained by submitting a completed "Authorized for Release of Employee Medical Records" form to the Occupational Health Department, 30 Flatbush Avenue, Room 237-A, B180. Blank forms are available from your supervisor or safety administrator.

Your rights of access are explained in the Occupational Safety and Health Administration (OSHA) Regulation 29 CFR 1910.1020, Access to Employee Exposure and Medical Records. A copy of the regulation is available from your supervisor or safety administrator.

AUTHORIZATION FOR RELEASE OF EMPLOYEE MEDICAL RECORDS

Standard of the Occupational Safety and Health Act, 29 CFR 1910.1020 - Access to Employee Exposure and Medical Records

Date of Request _____

I, (please print) _____ Emp No. _____ S.S. No. _____
hereby authorize the Con Edison Occupational Health Department to release to:

Doctor _____

Address _____
City State Zip

Individual _____

Address _____
City State Zip

Designated Representative _____

Address _____
City State Zip

the following medical information from my medical record:

NOTE: *Data released will not include Mutual Aid Society records prior to 1985 unless specifically requested.*

Medical Exam Data -- year _____

Lab Data -- year _____

Blood, Urine, X-ray, EKG, Other (specify) _____

I give my permission for this medical information to be used for the following purpose:

_____

_____

_____

but do not give permission for any other use or re-disclosure of this information.

Employee Signature _____ Date _____ Time _____

Safety Administrator Signature (or designee) _____ Date _____ Time _____

THE SAFETY ADMINISTRATOR OR DESIGNEE SHALL DELIVER THE COMPLETED FORM WITHIN (2) TWO WORKING DAYS OF RECEIPT TO OCCUPATIONAL HEALTH, 4 IRVING PLACE, ROOM - A.RESPONSE FOR EXPOSURE RECORDS SHALL BE MADE WITHIN 15 (FIFTEEN) WORKING DAYS OF RECEIPT. RESPONSES WILL BE MAILED (RETURN RECEIPT REQUESTED) TO THE ADDRESS INDICATED ABOVE.

The initial copy of employee exposure information is provided at no cost. Subsequent requests for new or additional data are also provided free of charge. There is a service charge for requests for additional copies of information previously provided ($6 per X-ray and $.70 per page).

Copies of this form can be obtained from your supervisor or safety administrator.

THIS AUTHORIZATION EXPIRES SIX MONTHS FROM DATE OF REQUEST.

REQUEST FOR EMPLOYEE EXPOSURE RECORDS

Standard of the Occupational Safety and Health Act, 29 CFR 1910.1020 - Access to Employee Exposure and Medical Records

Date of Request _____

Name (please print) _____
Last First M.I.

Organization _____ Employee No. _____ S.S. No. _____

Job Title _____

Mailing Address _____

EXPOSURE RECORD REQUEST

Material(s) exposed to (e.g., substances) _____

Physical Agent(s) exposed to (e.g., noise) _____

Facility (e.g., Hudson Ave.) _____

Location (e.g., Boiler 20) _____

Date(s) of Exposure _____

Employee Signature _____ Date _____ Time _____

Safety Administrator Signature (or designee) _____ Date _____ Time _____

THE SAFETY ADMINISTRATOR OR DESIGNEE SHALL DELIVER THE COMPLETED FORM WITHIN (2) TWO WORKING DAYS OF RECEIPT TO ENVIRONMENT, HEALTH, AND SAFETY, 4 IRVING PLACE (M020), ROOM 828
RESPONSE FOR EXPOSURE RECORDS SHALL BE MADE WITHIN 15 (FIFTEEN) WORKING DAYS OF RECEIPT.

CONFIRMATION OF EMPLOYEE RECEIPT OF INFORMATION REQUESTED

Employee Signature _____ Date _____ Time _____

Safety Administrator Signature (or designee) _____ Date _____ Time _____

The initial copy of employee exposure information is provided at no cost. Subsequent requests for new or additional data are also provided free of charge. (There is a service charge for requests for additional copies of information previously provided.)

Copies of this form can be obtained from your supervisor or safety administrator.

EMPLOYEE REPORT OF INCIDENT

Name _____ Employee No. _____ S.S. No. _____

Station/Facility _____

Date/Time Reported: _____

Date/Time of Incident: _____

Employee Description of Incident (To be completed by employee):

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

Employee Signature: _____

Please circle:

Sample Taken:	Yes	No
Results Attached:	Yes	No

Supervisor's Signature: _____

**THIS IS AN EMPLOYEE'S REPORT OF A CLAIMED EXPOSURE:
IT DOES NOT CONSTITUTE AN ADMISSION BY THE COMPANY.**

Safety Administrator's Signature _____

Note:
Send form to:

Occupational Health
Consolidated Edison Company of NY, Inc.
4 Irving Place
Room 328
New York, New York 10003

1.0 PURPOSE

IT IS THE POLICY OF CON EDISON TO COMPLY WITH ALL FEDERAL, STATE, AND LOCAL REGULATIONS PERTAINING TO MERCURY MANAGEMENT. The mercury management program will provide instructions for responding to metallic mercury spills. The objective of the program is to contain and control metallic mercury releases to limit their impact on personnel, property, and the environment.

2.0 APPLICABILITY

This procedure applies to all Con Edison employees who handle mercury, including the collection and removal of mercury-containing instrumentation, the adding or draining of mercury from instrumentation, and cleanup operations at all Con Edison and customer locations.

3.0 INTRODUCTION

Mercury is a highly toxic material, which may enter the body through inhalation, ingestion, and/or absorption. Because mercury exists as a liquid at room temperature and may vaporize, the primary route of exposure to mercury is inhalation of the vapor. Repeated low-dose exposure over a long period of time, which is referred to as ***chronic exposure***, can lead to serious health effects involving the kidneys and the central nervous system. For this reason, proper handling methods and the appropriate personal protective equipment (PPE) shall be used when working with mercury. Mercury may be found in thermometers and in pressure measuring instruments, such as gas regulators, manometers, and gauges.

4.0 COMPLIANCE REQUIREMENTS

4.1 JOB SETUP

Prior to starting a job, the employee shall determine whether mercury may be contained in a component and how containment will be set up with respect to the work to be performed.

Mercury-containing equipment shall be inspected prior to installation or handling to ensure that no leakage occurs. For example, a manometer shall be inspected in a station, and a thermostat to be installed in a customer's home shall be inspected before it is taken to the residence.

When mercury-containing equipment, such as gas regulators or thermostats, is worked on or handled, proper mercury spill protection shall be installed. The following two containment methods, with modifications as necessary, shall be used to contain a spill:

- One layer of 6-mil polyethylene shall be placed in the area with the edges curved or folded inward 4 to 6 inches and taped.

- A drip pan or bucket shall be placed directly underneath the work area.

In the event that the operation presents the danger of mercury spraying or spewing due to pressure in the line, a shield capture system, such as a glove bag, shall be constructed to limit the area of contamination as well as exposure to the workers and/or customers. If the work area is not well ventilated a window or door can be opened for additional ventilation. If natural ventilation is not possible, powered ventilation shall be utilized.

4.2 PERSONAL PROTECTIVE EQUIPMENT

4.2.1 Handling

- When intact mercury-containing equipment or instrumentation is handled, PPE is required, including work clothes, safety shoes, and cotton or leather gloves.

- When contaminated equipment or instrumentation is handled and/or there is the potential for skin or clothing to come into contact with mercury, impervious PPE is required. The level of protection necessary will be dictated by the operation being performed. For example, a transfer of mercury to a manometer would require impermeable gloves, an apron, and eye protection.

- Eye protection, provided by safety glasses, shall be used at all times work is performed involving mercury. If the operation involves a pressurized system or if splashing or splattering may occur, a faceshield shall be worn along with appropriate eye protection.

- Personnel engaged in mercury-related work shall wash their hands or other affected areas with soap and water after completing tasks. Smoking, eating, and applying cosmetics shall not be permitted while work addressed in this procedure is performed.

- Spill cleanup operations or work in mercury-contaminated areas shall require the use of disposable coveralls and booties, an apron, eye protection, and a faceshield. The required level of PPE shall be such that clothing and skin contact with mercury shall not occur.

4.2.2 Respiratory Protection

- Respiratory Protection is not required when handling mercury in a sealed, intact container or instrument (i.e., gas regulators, manometers, Bailey meters, and thermostats).

- A half-face MSA respirator equipped with mercury cartridges is required in the event of a spill during cleanup operations in the designated "hot area". The "buddy system" (two or more workers) shall be used so that in the event that the mercury cartridge indicator changes, the worker's companion can warn him or her to leave the area immediately and replace the cartridges.

- A self-contained breathing apparatus (SCBA) or airline respirator with a 5-minute escape bottle will be used when work is performed in areas where mercury concentrations are unknown or when elevated mercury concentrations exist and forced air ventilation is not possible. An SCBA or airline respirator with a 5-minute escape bottle is also required when mercury comes in contact with hot surfaces, as this increases vapor concentration in air by accelerating volatilization requiring a higher level of respiratory protection.

- PPE shall be removed prior to leaving the work area. All PPE shall be properly disposed of.

NOTE: All employees who wear respiratory protection shall be medically approved, fit-tested, and trained in the proper use of a respirator. All Con Edison employees who use respiratory protection shall adhere to the requirements of Con Edison Corporate Safety Procedure (CSP) 04.00 - *Respiratory Protection Program*. Respiratory protection shall be downgraded only under the guidance of Environment, Health, and Safety (EH&S).

4.3 WORK PRACTICE

4.3.1 Equipment Use

- Prior to working on or with mercury-containing equipment such as gas regulators or Bailey meters, a survey of the area for visible external mercury contamination shall be performed. Visible contamination will appear as small silver balls of material dispersed over the area. Should contamination be discovered, workers shall contact their supervisor, who will contact Central Information Group (CIG) for proper notifications.

- If contamination is not found, workers shall evaluate whether the mercury is under pressure and shall proceed with job setup as described in Section 4.1.

- In the event of a spill or contamination, the spill procedures in General Environmental Instruction (GEI) Section 2.23, *Cleanup of Mercury Spills*, shall be followed. These procedures are summarized briefly in Section 4.4 of this CSP.

4.3.2 Mercury Handling

- If mercury will be added or drained from instrumentation or equipment, the employee shall don appropriate PPE as identified in Section 4.2.

- When mercury will be added or drained from equipment, the work will be performed in a well-ventilated area. In all locations the instrumentation shall be put onto a layer of 6-mil polyethylene or into drip pans or buckets to prevent contamination of the work area, if a spill occurs.

- The mercury will be added to the instrument slowly in order to prevent the possibility of an overflow. Mercury, being a very dense liquid, is very difficult to handle and will require trained or experienced personnel.

- When enough mercury has been added to the equipment or instrumentation, a layer of water shall be added to prevent vapor releases. Water will sit on top of the mercury, which in turn does not permit vaporization of the mercury.

- In the event a spill occurs, the procedure in Section 4.4.2 - ***Uncontrolled Release*** shall be followed.

- If, during operation, any equipment or tools become contaminated with mercury, secure the equipment in the contaminated area, cover the area with plastic sheeting, ventilate the area, and contact the EH&S ChemLab. The ChemLab AND THE OPERATING DEPARTMENT will make an on-site determination as to whether the equipment will be decontaminated or disposed of AS MERCURY CONTAMINATED WASTE. Lab personnel will decon the tools or equipment at the site. The tools or equipment will then be placed in a plastic bag or covered in plastic for later testing to determine if they were properly deconned.

4.4 SPILL RESPONSE

Mercury spills shall be addressed in accordance with GEI Section 2.23, *Cleanup of Mercury Spills*. Fluorescent lamps containing mercury shall be handled in accordance with GEI Section 6.03, *Storage and Disposal of Used Incandescent, HID, and Fluorescent Lamps*. The *Environmental Specification for the Management of Mercury Wastes Not Covered by the Universal Waste Rule,* ES-010, will be followed by Con Edison contractors who clean up mercury spills.

4.4.1 Controlled Release

Mercury that is spilled and captured by the containment is referred to as a ***controlled release***. In the event of a controlled release, the following actions shall take place:

- Adequate ventilation shall be provided. Ventilation shall be exhausted to the outdoors or to an exhaust hood. Building ventilation systems shall be immediately isolated to prevent the spread of mercury vapors into other areas.
- The area shall be protected continuously until properly clear.
- The containment (polyethylene or drip pan) and other contaminated equipment or instrumentation shall be placed in two polyethylene bags and sealed shut. Edges shall be folded inward to contain and prevent spillage.
- Transporting waste in double 6-mil bags is required, at a minimum, when handling mercury in residences.
- Sharp edges on instruments or components shall be protected prior to bagging to prevent breeches.
- The contaminated bag shall be placed into a 55-gallon drum at the workout location.
- The drum storage and disposal area shall be covered and sealed at all times. Follow labeling instructions as detailed in Section 7.0 of the Con Edison Corporate Environmental Procedures (CEPs) Manual, GEI Section 2.23, *Cleanup of Mercury Spills*, and GEI Section 6.15, *Labeling of Hazardous Waste Drums for on-site storage*.

- The area shall be inspected to verify that no further mercury contamination is present, and to verify that all sources of mercury are secured and controlled. If mercury is identified, follow Section 4.4.2.

4.4.2 Uncontrolled Release

The following steps shall be taken immediately in the event of an uncontrolled mercury release where mercury has not been adequately contained:

- Workers shall notify their supervisor and safety administrator immediately. Notification procedures, as identified in GEI Section 2.01, *Spill Reporting*, and GEI Section 2.23, *Cleanup of Mercury Spills*, shall be followed.

- The operation shall be stopped, and all components carefully shut down or secured.

- The impacted area shall be secured, and people shall be evacuated.

- Only trained personnel shall clean up any level of mercury spill. No attempt shall be made to sweep or clean the area.

- Access to the area shall be limited by closing doors or using tape or barricades. Disposable booties should be used to prevent the spread of mercury contamination. The need for evacuation will be determined by on-site personnel in communication with EH&S.

- The building ventilation system shall be shut off to prevent the spread of vapors.

- If the spill is enclosed in a cabinet, the cabinet doors shall be opened to allow ventilation. If the spill occurs under a lab fume hood, the hood should continue to run. The contaminated area shall be isolated away from any occupied areas whenever possible.

- If an uncontrolled spill occurs resulting in mercury exposure to the environment, the EH&S representative shall be responsible for ensuring that all applicable federal, state, and local regulations are being properly followed.

- Only Technical Services Laboratory (TSL) personnel or approved contractors under the guidance of EH&S shall perform mercury

cleanup operations and survey the atmosphere to determine the presence of mercury. Only approved methods and techniques shall be used. EH&S and TSL representatives shall determine whether or not an outside contractor shall be brought in to perform the cleanup operation.

- Access limitations during the course of the cleanup shall be designated by a representative of TSL or EH&S.

- EH&S and TSL shall periodically perform personal monitoring and implement protective measures for personnel safety.

4.5 STORAGE OF MERCURY INSTRUMENTATION

Mercury waste shall be stored in accordance with GEI Section 2.23, *Cleanup of Mercury Spills.* Fluorescent lamps will be stored in accordance with GEI Section 6.03, *Storage and Disposal of Used Incandescent, HID, and Fluorescent Lamps.*

4.6 DISPOSAL

Mercury wastes shall be labeled and disposed of in accordance with GEI Section 2.23, *Cleanup of Mercury Spills,* Section 6.06, *Removal, Cleanup, Storage, and Disposal of Gas Regulators and Other Mercury-Containing Equipment*, and Section 6.15, *Labeling of Hazardous Waste Drums for On-Site Storage.*

4.7 TRAINING

Mercury awareness training is required for all employees handling mercury-filled equipment.

All chemical lab workers shall be trained in cleanup and monitoring procedures.

Annual refresher training shall be given and documented as needed.

All training shall be documented and maintained for three years.

5.0 DEFINITIONS

Controlled Release: A mercury spill that is "contained" using plastic sheeting or a drip pan.

Chronic Exposure: Consistent low-dose exposures over a long period of time.

Uncontrolled Release: A mercury spill that is not properly contained on plastic sheeting or in a drip pan and requires specialized cleanup.

6.0 RESPONSIBILITIES

Employees: Con Edison employees shall follow the requirements of the Mercury Management Program, including using appropriate procedures and attending required training. In addition, employees shall be medically approved, fit-tested, and trained in the proper use of a respirator. Employees who use respirators shall adhere to the requirements of CSP 04.00 - *Respiratory Protection Program.*

Environment, Health, and Safety (EH&S): EH&S will determine whether or not an outside contractor shall be brought in to perform the cleanup operation. In addition, EH&S will designate access limitations during the course of the cleanup, and provide technical guidance and consultation as required. EH&S functions include:

- Reviews applicable regulations and ensures that procedures meet all regulatory requirements.
- Revises procedures as applicable.
- Reviews/approves controlled documents prior to release.
- Distributes updates and changes.
- Reviews training prepared by the Learning Center.
- Provides technical assistance to Safety Administrators.
- Coordinating and conducting air monitoring.
- Ensuring that all exposure monitoring data is entered into the Safety and Health Information Management System (SHIMS).

Facility or Site Manager Responsible for Compliance: The Con Edison designated individual within each operating organization who is responsible for ensuring compliance with federal, state, and local regulations, and this procedure. This individual shall verify that all affected employees have received mercury awareness training.

Law Department: The Law Department shall assist and provide guidance to EH&S by reviewing changes to these procedures in light of all applicable statutes and regulations to ensure that the procedures meet all legal requirements.

Learning Center: The Learning Center and Operating Organizations are responsible for developing, reviewing, and assisting in OSHA-required training. The Learning Center shall conduct mercury awareness training for all employees handling mercury-filled

equipment. In addition, the Learning Center will maintain records of training.

Operating Organizations: Unless otherwise indicated, operating organizations (Customer Service, Electric, Fossil, Gas, Purchasing and Stores, Steam, and Systems & Transmission Operation [S&TO]) shall designate a representative responsible for compliance with federal, state, and local regulations, and this procedure.

7.0 REFERENCES

Federal:

Title 29, Code of Federal Regulations, Part 1910.134 - Respiratory Protection.

Title 29, Code of Federal Regulations, Part 1910.1000 - Air Contaminants.

Title 29, Code of Federal Regulations, Part 1910.1020 - Access to Employee Exposure and Medical Records.

Title 29, Code of Federal Regulations, Part 1910.1200 - Hazard Communication.

Agency for Toxic Substances and Disease Registry's (ATSDR's) Toxicological Profile for Mercury.

Con Edison:

Corporate Safety Procedures

04.00 - Respiratory Protection Program.

Corporate Environmental Procedures Manual

Section 07.00 - Chemical

General Environmental Instructions

02.01 - Spill Reporting

02.23 - Cleanup of Mercury Spills

06.03 - Storage and Disposal of Used Incandescent, HID, and Fluorescent Lamps

06.06 - Removal, Cleanup, Storage, and Disposal of Gas Regulators and Other Mercury-Containing Equipment

06.15 - Labeling of Hazardous Waste Drums for On-Site Storage.

PURPOSE AND APPLICATION

This GSI describes the requirements for handling elemental mercury and mercury-containing equipment. This GSI does not address response to mercury spills. Mercury spill response is addressed in General Environmental Instruction (GEI) 2.23, Clean-up of Mercury Spills. Only the ChemLab may clean up spills.

PRE-WORK REQUIREMENTS

A. Mercury-containing equipment must be inspected prior to installation, transportation, or other handling to ensure that no leakage occurs.

B. Appropriate personal protective equipment (PPE) must be used while handling mercury or mercury - containing equipment.

C. Spill protection must be installed prior to working on or installing mercury-containing equipment.

PERSONAL PROTECTIVE EQUIPMENT

The following PPE requirements apply to activities involving the handling of mercury during routine (non-spill related) tasks.

Intact mercury-containing equipment:

- Proper work clothes worn to cover the arms and legs
- Eye protection (safety glasses, or splash goggles)
- Safety shoes
- Cotton or leather work-gloves
- Additional PPE appropriate to specific task

Direct handling, or transfer of mercury from a container:

- All PPE required for handling intact mercury-containing equipment
- Impervious apron
- Nitrile or neoprene gloves

Mercury-contaminated equipment:

- All PPE required for handling intact mercury-containing equipment

- Poyethylene or Saran coated coveralls
- Nitrile or neoprene gloves
- Respiratory protection may be required

WORK PROCEDURES

1. Prior to working on or with mercury-containing equipment, the area shall be surveyed for visible contamination. Should contamination be discovered, leave the area, taking care not to contact the visible mercury, or track contamination by walking. Contact a responsible supervisor immediately.

2. Prior to handling mercury, workers shall ensure that the area is well ventilated (natural ventilation, such as opening a window) is adequate for routine handling, and don appropriate PPE.

3. When adding or draining mercury, workers shall:

   a. Place equipment/instrumentation onto a absorbent pad on top of a layer of 6-mil polyethylene, or into drip pans or buckets to prevent contamination of work area if a spill occurs.

   b. Add mercury to the instrument/equipment slowly to minimize the potential for overflow.

4. If the mercury may spray as a result of pressure in the equipment, a shield/capture system, such as a glove bag, shall be constructed to limit potential exposure and contamination.

5. Workers shall not eat, drink, smoke, or apply cosmetics in work areas where mercury is being handled. Following handling, workers shall wash their hands and any other affected areas with soap and water. Washing shall be performed prior to eating drinking, smoking, or applying cosmetics whenever handling mercury.

MERCURY SPILL CLEAN-UP

1.0 PURPOSE AND SCOPE

1.1 PURPOSE

The purpose of this procedure is to provide safe and environmentally sound guidelines for cleaning up spills of elemental mercury.

1.2 SCOPE

This procedure is to be followed whenever it is necessary to clean up a spill of elemental mercury at a company, private, or public location.

2.0 REFERENCES

2.1 Field Guide For Responding To Emergencies Involving Mercury Releases

2.2 Jerome 431-X Mercury Vapor Analyzer Operation Manual.

2.3 Material Safety Data Sheet (MSDS) for Mercury.

2.4 MI Tracker 3000 Mercury Vapor Analyzer Operation Manual

3.0 TRAINING REQUIREMENTS

3.1 All technicians must be trained in this procedure by a supervisor or an experienced technician before performing a Mercury cleanup.

3.2 The Field Group Supervisor shall review with technicians the MSDS for Mercury.

3.3 Technicians shall be trained in the operation of all sampling equipment and instrumentation to be employed during clean-up activities

4.0 DEFINITIONS

4.1 Floor level reading - a measurement taken no more that three inches from substrate.

4.2 Expected breathing zone measurement - a measurement taken in the area where a person would expect to be breathing while performing a particular function or functions. Note: Breathing zone heights may change given different body positions associated with various activities/tasks

4.3 Point of Spill measurements- Performed within 3 inches of mercury affected substrate.

5.0 SAFETY

5.1 PRECAUTIONS

5.1.1 Elemental mercury exists at room temperature as a liquid; however it can vaporize at temperatures as low as 10 F. Mercury enters the body through inhalation, ingestion, or skin contact. The primary route of entry is inhalation.

5.1.2 Brief exposures at high concentrations of mercury vapor can cause severe respiratory damage, while lower long-term exposure may damage the central nervous system. Inhalation of mercury vapors may produce a metal fume-fever like syndrome that include symptoms such as; chills, nausea, general malaise, tightness in the chest, and respiratory symptoms. High concentrations cause severe irritation of the bronchial tubes and deep portions of the lungs. Long-term lower level exposures may produce signs such as weakness, fatigue, loss of appetite and weight, and tremors of the fingers, eyelids, and lips.

5.1.3 Consult MSDS for additional information including first aid measures.

5.2 PERSONAL PROTECTIVE EQUIPMENT

5.2.1 Nitrile surgical gloves, and vinyl booties are the minimum PPE required.

5.2.2 MSA Half-Face Air Purifying Respirator with Mersorb Indicator Chemical cartridge must be used if mercury contamination levels in the expected breathing zone are 0.025 mg/m3 to 0.5 mg/m3. It shall also be worn when mercury or possible mercury contaminated debris are being vacuumed or otherwise disturbed by the cleaning process.

5.2.3 Self Contained Breathing Apparatus (SCBA) or airline respirator with an escape bottle must be used if mercury contamination levels in the expected breathing zone are between 0.5 mg/m3 and 0.998 mg/m3 SCBA shall also be used if the breathing zone contamination levels cannot safely be determined without the possibility of exposure to contamination levels of 0.5 mg/m3 or greater.

5.2.4 Cover alls are required in situations where physical contact with Mercury is possible. In cases where bodily contact with mercury is unpreventable poly-coated coveralls shall be donned.

6.0 ENVIRONMENTAL

6.1 All contaminated or potentially contaminated waste shall be double-bagged, sealed with duct tape and properly labeled. Waste shall be given to a representative of the organization that requested the clean-up for proper disposal.

6.2 All contaminated waste generated from a spill at the laboratory or involving its personnel or equipment shall be disposed of in accordance with the laboratory's Hazardous Waste Management Plan for disposal of mercury-contaminated waste.

7.0 EQUIPMENT AND MATERIALS

7.1 EQUIPMENT

7.1.1 Jerome 431-X Mercury Vapor Analyzer

7.1.2 Mercury Vacuum and attachments

7.2 MATERIALS

7.2.1 Merconvap Solution

7.2.2 Hand tool kit

7.2.3 Plastic bags of sufficient size and strength to safely contain expected volume and type of mercury contaminated waste.

7.2.4 Heavy duty 2" duct tape

7.2.5 Flashlight

8.0 RESPONSIBILITIES AND NOTIFICATIONS

8.1 Advice and council with representatives of Industrial Hygiene may be necessary prior to Clean-up, and/or during clearance following clean-up.

8.2 No clean-up is to begin prior to consultation with the responsible representative of the requesting organization.

8.3 In the event that a laboratory supervisor is not present at the time of the initial call for a clean-up, a supervisor or the EDS shall be notified.

8.4 Technicians shall notify their supervisor or the EDS of ANY uncontrolled release at the laboratory, or involving laboratory equipment or personnel.

9.0 PROCEDURE

9.1 Check that the Jerome 431-X has been calibrated by the manufacturer withing the last twelve months and functions test Jerome as per 431 Operating Manual prior to performing any survey activities. Record the results in the calibration log book

9.2 Check that a new bag has been installed following the last use of the mercury vacuum.

9.3 Check that the exhaust of the vacuum using the Jerome 431 X to ensure the Charcoal filter is not saturated. Change the filter if necessary.

9.4 Upon arrival at the job site ensure that the affected area is properly ventilated; e.g. spill area maintained under negative pressurization relative to adjoining areas. Ensure that local exhaust ventilation does not affect adjoining areas and is not positioned to facilitate entrainment by HVAC system intakes. Make sure that any HVAC or air-circulating systems is turned off.

9.5 Don appropriate PPE. (Refer to section 5.2 of this procedure.)

9.6 Assess the situation to determine the extent of the spill and the levels of contamination involved. When approaching the affected area use the Vapor analyzer to continuously monitor the expected breathing zone. A flashlight is useful for finding mercury beads

9.7 Establish and isolate a "hot" zone and limit access to essential personnel only. The 'HOT ZONE' shall include all areas where any mercury contamination is detected.

9.8 Vacuum all visible mercury wearing appropriate PPE (Refer to section 5.2 of this procedure). Note: Consideration shall be given to providing a 'runner' to reach the visibly contaminated areas to prevent the spread of contamination.

9.9 Conduct a thorough vapor survey of all suspect areas utilizing floor level readings to locate any remaining mercury. Particular attention shall be paid to seams, cracks, porous materials or any other condition that would enable the mercury to "hide".

9.10 Vacuum any additional mercury found. Ventilate area. Continue vacuuming, and ventilating until all visible Mercury and contaminated areas are cleaned.

9.11 Allow affected area to ventilate for a minimum of 30 minutes following conclusion of vacuuming/general clean up

9.12 Re-survey affected area and treat all areas with detectable floor level readings with Merconvap.

9.13 At completion of vacuuming, remove bag and wipe inside of vacuum with Merconvap.

9.14 Mercury waste shall be disposed of as per section 6.0 of this procedure

9.15 Allow area to ventilate for a minimum of 8 hours and resurvey.

9.16 Acceptable final clearance readings shall be in accordance with table 1. Any situations deviating from those criteria shall be discussed with Industrial Hygiene to determine alternate clearance levels as appropriate.

9.17 Area shall remain isolated until final clearance is given.

9.19. REPORTS AND RECORDS

9.18.1 The job shall be assigned a Lab Sequence Number.

9.18.2 A batch level text report shall be issued to the requesting organization. Copies of the report shall be sent to the Industrial Hygiene and/or Environmental Affairs reps if requested.

9.18.3 The report shall contain, but not be limited to, the following:

- Date and time of initial request for clean-up.
- Date and time of arrival at spill location.
- Initial breathing zone readings
- Clean up breathing zone readings
- Final breathing zone readings
- Estimate of the volume of mercury identified during clean-up.
- Date, time and description of each action taken during clean-up. e.g. vacuuming, application of Merconvap, removal of flooring etc.
- A listing of all material (furnishings, flooring etc.) that is removed from the location.

9.19 LIMITATIONS

9.19.1 Technicians actually taking the mercury vapor measurements shall remain as non-contaminated as possible. Contamination levels on PPE may contribute to Mercury levels with the survey creating higher results.

9.19.2 All readings of 0.000 to 0.002 mg/m^3 shall be reported as <0.003 mg/m^3. This is the lowest detection limit of the Jerome 431-X.

Table 1

Type	Air Concentration	Instrumentation /Method	Comments	Rationale/Source
Spill Final Clearance Level	< or equal to **0.003 mg/m3** at point of spill, as practicable[1]	Jerome Meter	Allow flexibility on a case-by-case basis. Consider use and occupancy characteristics of area where spill occurred. (e.g. "Living" Area [2] vs. "Non-Living" or "storage" area), other possible sources of mercury, and possible interferences. Keep in mind potential for change in occupancy.	Approximately ten times below ATSDR Lowest Observable Effects Level (LOEL) of 0.026 mg/m3. "Shakiness" is reported at exposures to this level for 15 years
Residential Isolation Level	0.010 mg/m3	Jerome Meter	Isolate residents from immediate area. Implement controls where possible to maintain occupied areas below this level. Consider evacuation if levels are consistently above this level in occupied "living" areas and mercury vapors cannot be prevented from reaching living spaces.	ATSDR [3] Near "Residential Evacuation Level" used by NJ DOH (0.012 mg/m3)
Employee Action Levels (Breathing Zone)	0.025 mg/m3 ACGIH TLV 0.050 mg/m3 NIOSH REL 0.1 mg/m3 OSHA Ceiling Limit 10 mg/m3 OSHA IDLH	Jerome Meter and/or Dosimeter Badge	Indicates need for respiratory protection if ventilation/controls fail to reduce levels. Use most conservative limit (ACGIH TLV) see CSP 4.0 for protection factors Use only SCBA w/escape or airline w/escape for IDLH	Regulated and recommended occupational exposure limits
Acceptable Level for contaminated personal effects	0.010 mg/m3	Jerome Meter	Perform ATSDR modified test procedure by warming personal effects (to room temperature) in plastic container or bag. Measure air concentration in trapped air. Where Hg levels are at or below action level – effects may remain in owner's possession.	ATSDR [3]

Criteria for pre- and post- area monitoring:

Pre-and Post-Removal Action Level (BZ[4] reading)	>0.003 mg/m3	Jerome Meter	If above level, report as a spill. If at or below level, no further action needed	ATSDR "Home Screening Level" as reported by AGA

(1) Point of spill measurements are performed within 3 inches of mercury affected substrate. Certain situations may preclude practical achievement of 0.003 mg/m^3. These situations shall be assessed on a case-by-case basis, and final point of spill concentrations shall not exceed 0.010 mg/m^3.

(2) Living area may be defined as an area occupied over 20 hours/day (source: adaptation from EPA Region 5 Draft document discussion of Ohio Action Levels p.3-7) (3) Source: ATSDR document "Suggested Action Levels for Indoor Mercury Vapors in Homes or Businesses with Indoor Gas Regulators"

(4) BZ = Breathing Zone – measure at 3-4 height (modified from adult 5' BZ to consider children/toddler BZ of 3'). 3' level also recommended in EPA Region 5 Draft document

"US EPA Region 5 Mercury Response Guidebook"

Con Edison **Customer Service Procedure** **2-0-2**

TITLE

CUSTOMER OPERATIONS--GENERAL: Customer Care Emergency Response Plan

TABLE OF CONTENTS

DISTRIBUTION: CO, PA, EO, SO, SP

1.0 PURPOSE--Con Edison's Customer Care Response Plan establishes and describes Customer Operations guidelines for readiness and prompt action to coordinate efforts that will provide assistance ("Customer Care") to those inconvenienced by an incident. Customer Care is further defined as providing updated information to those affected, assisting in the provision of temporary housing, food, clothing, petty cash, transportation, interpreters and medical arrangements, when necessary, and serving as the customer's advocate. This procedure supplements corporate emergency response procedures.

2.0 DECLARING A CUSTOMER CARE EMERGENCY--Upon notification by the CMG (Customer Operations Communications Monitoring Group) that an event has occurred which may require Customer Care assistance to customers, Customer Outreach will determine whether to initiate the Customer Care Emergency Response Plan. When a determination is made that Customer Care assistance is needed, Customer Outreach will then notify CMG that the Customer Care procedure is in effect. Biannually, updated Customer Outreach Emergency Contact information will be sent to the CMG and to all department heads listed in paragraph 6.0.

3.0 GUIDELINES FOR INITIATING THE CUSTOMER CARE PLAN--The Customer Operations plan will be invoked when or if one of the following occurs:

- The health and safety of customers directly affected by the emergency are adversely impacted to a significant degree by an electric, gas, or steam system condition.
- Unforeseen and disruptive events arise during severe natural phenomena, environmental events, hazardous materials releases (or even the possibility thereof), that could have a negative impact on service or safety.
- Major portions of the Con Edison system are impacted.

- Environmental contingencies such as gas leaks, hazardous steam conditions, asbestos releases, and the like may result in potential health hazards to the general public or those in the immediate vicinity of the incident.

- A situation develops that responding Company personnel determine may adversely affect customers and consumers.

4.0 CUSTOMER CARE EMERGENCY RESPONSE NOTIFICATION PROCESS--
Immediately after the declaration of a Customer Care Emergency, the following notifications will be made to the:

- Area Customer Outreach Advocates.
- Customer Operations Communications Monitoring Group (CMG).
- Vice President of Customer Operations.
- General Manager of Customer Assistance.
- General Manager of Field Operations.

5.0 OBJECTIVES FOR THE CUSTOMER CARE EMERGENCY RESPONSE PLAN--
It is the responsibility of Customer Outreach personnel to provide help to customers during the emergency, to coordinate the Customer Care Emergency Response Plan, and act as liaisons with various departments. The objectives of the plan are to:

- Assist customers in obtaining updated information during an emergency.

- Assist in providing affected customers with temporary housing, food, clothing, petty cash, transportation, interpreters, and medical arrangements, when necessary.

- Intervene on behalf of the affected customer with Company departments, governmental and social service agencies and other agencies or bodies deemed necessary.

- Maintain an infrastructure of Customer Service resources to respond to the needs of affected customers.

- Provide updated customer and incident information to the Customer Operations Communications Monitoring Group.

6.0 CUSTOMER CARE RESPONSE--When the Customer Care Emergency Response Plan is invoked, a Customer Outreach coordinator will be designated. The Customer Outreach coordinator will, in concert with Public Affairs, enlist assistance from the following functional areas as needed:

- Customer Operations.
- Corporate Communications.
- Governmental Relations.
- Environmental Health and Safety.
- Electric, Gas and Steam Operations.
- General Accounting.
- Information Resources.
- Law Department.
- Media Relations.
- Transportation.
- Real Estate
- Any other department deemed necessary by the Public Affairs Director or designee and/or the Customer Outreach coordinator.

7.0 CUSTOMER CARE SITE ORGANIZATION--A Customer Outreach coordinator will be present at all times at the site and will assess the emergency, determine the resources needed, manage the Customer Care Response Plan, and act as the liaison with all Company departments. The Customer Outreach coordinator will maintain the Customer Care log and will document all Customer Care activities. The coordinator will assign additional Customer Outreach personnel as needed and, if necessary, enlist additional Customer Operations support.

8.0 POST-EMERGENCY PREPAREDNESS--After the immediate emergency that invoked this plan has been brought under control or resolved, it may be necessary to continue applying the procedures outlined in the Customer Care Emergency Response Plan due to remaining customer issues.

9.0 POST-EMERGENCY EVALUATION--After all the customer issues have been resolved, Customer Outreach management will perform an assessment of its response and procedures. A written assessment report will be prepared that includes an overview of the Customer Care emergency, an evaluation of the Company's response, and specific changes and recommendations for improvement, where needed.

10.0 PROCEDURAL RESPONSIBILITY--The Vice President, Customer Operations, is responsible for this procedure.

Monitoring

Sylvester, Carol

From: Prud'homme, Jeanine R
Sent: Friday, March 23, 2001 1:18 PM
To: Sylvester, Carol
Cc: Fox, Janet R; Crane, Michael A. MD; Mirda, Dennis J.; Westfall, Lois; Lee, Christine M.; Slintak, Greg
Subject: Mercury Gas Regulator Program: Employee Biological Monitoring

Importance: High

Below is the description of the mercury biological monitoring plan for all personnel participating in the Mercury Gas Regulator Removal Program, as agreed upon by Industrial Hygiene, Occupational Health, and Gas Operations. It is recommended that you include this in your formal Regulator Removal Program planning documents. All employees participating in this program should be given training related to health effects of mercury, the proper procedures relating to the safe removal of the gas regulators as well as the results of pertinent employee exposure monitoring prior to receiving this offering in order to allow for an informed consent.

As part of the mercury regulator replacement program, Gas Operations will be offering testing to weekly field personnel and first line supervisors assigned full time to the program. Industrial Hygiene, Occupational Health, and Gas Operations strongly encourage all mechanics and supervisors assigned to the mercury removal program to participate in the testing. We recommend that the Chem Lab personnel assigned to clean up mercury spills also participate in the testing program. Testing also will also be available to Gas Operations employees that remove mercury containing equipment outside of the formal removal program.

The Biological Monitoring Procedure is as follows:

- All testing will be conducted by Pacific Toxicology, a certified laboratory under contract to the Occupational Health Department.
- All testing will be conducted under the direct supervision of nurse Christine Lee from the Occupational Health Department.
- All testing will be conducted prior to the start of the employees shift.
- Testing will be conducted at Con Edison locations in Queens and Westchester.
- The testing will consist of a "spot" mercury in urine test conducted at the start of the removal program with a retest every six months for the duration of the program.
- Employees will receive confidential, written notification of the results of their testing as soon as feasible after the completion of testing but no later than fourteen (14) days after the testing is performed.
- In the event of discovery of significantly elevated acute or chronic mercury exposures to personnel, or the discovery of a significantly elevated mercury in urine result, additional testing such as a 24-hour mercury in urine test, or a blood test, will be considered as well as any medical intervention, where indicated.
- As is standard policy, employees will be reminded that they should seek consult with Occupational Health, Industrial Hygiene, or Gas Operations EH&S personnel at any time if they experience symptoms which may be related to mercury exposure.
- Any employee with a result above the American Conference of Industrial Hygienists (ACGIH) Biological Exposure Indice (BEI) listed below will be removed from exposure to mercury, interviewed and counseled by Industrial Hygiene and/or Occupational Health, and will not be returned to work involving exposure to mercury until a retest indicates that mercury in urine or other applicable test results are below the ACGIH or other acceptable criteria.
- The ACGIH BEI for "Total inorganic mercury in urine" is 35 ug/g creatinine (taken as a preshift sample)
- The ACGIH BEI for "Total inorganic Mercury in blood" is 15 ug/L (taken as an end of shift/end of workweek sample)
- The ACGIH BEI acknowledges a "background" mercury concentration for non-occupationally exposed subjects, and incorporates background concentrations into the BEI value.

Below is the description of the mercury monitoring plan for tools being used by employees participating in the Mercury Gas Regulator Removal Program, as agreed upon by Industrial Hygiene, Occupational Health, and Gas Operations. It is recommended that you include this in your formal Regulator Removal Program planning documents.

As part of the mercury regulator replacement program, Gas Operations will be periodically test the tools utilized by the employees assigned full time to the program. Industrial Hygiene, Occupational Health, and Gas Operations strongly encourage all mechanics and supervisors assigned to the mercury removal program to cooperate in the testing. We recommend that the Chem Lab tools and instruments assigned to clean up mercury spills also participate in the testing program. Testing will also be available for the tools of Gas Operations employees that remove mercury containing equipment outside of the formal removal program.

The Tool Monitoring Procedure is as follows:

- All testing will be conducted by Con Edison's Chem Lab trained technicians.
- All testing will be conducted at the beginning of their use on the program.
- Testing will be conducted at Con Edison locations in Queens and Westchester.
- The testing will consist of use of a Jerome meter at the start of the removal program with a retest every six months for the duration of the program.
- Monitoring results will be forwarded to the Environmental Manager assigned to the program.
- In the event of discovery of significantly elevated mercury levels the tools will be removed from service and decontaminated or disposed of as Mercury Hazardous Waste. It is recommended that the employee who is in possession of the tools be sent for testing to ensure they have not been exposed to mercury at high levels.
- All tools will be tested at the end of the removal program or when they will no longer be utilized for the program.

Below is the description of the mercury monitoring plan for all vehicles participating in the Mercury Gas Regulator Removal Program, as agreed upon by Industrial Hygiene, Occupational Health, and Gas Operations. It is recommended that you include this in your formal Regulator Removal Program planning documents.

As part of the mercury regulator replacement program, Gas Operations will be periodically tested each of the vehicles assigned full time to the program. Industrial Hygiene, Occupational Health, and Gas Operations strongly encourage all mechanics and supervisors assigned to the mercury removal program to cooperate in the testing. We recommend that the Chem Lab vehicles assigned to clean up mercury spills also participate in the testing program. Testing will also be available for vehicles of Gas Operations employees that remove mercury containing equipment outside of the formal removal program.

The Vehicle Monitoring Procedure is as follows:

- All testing will be conducted by Con Edison's Chem Lab trained technicians.
- All testing will be conducted prior to the vehicles initial use on the program.
- Testing will be conducted at Con Edison locations in Queens and Westchester.
- The testing will consist of use of a Jerome meter throughout the vehicle (passenger and cab areas) at the start of the removal program with a retest every six months for the duration of the program.
- In the event that the ambient temperature has been low, the vehicles will be started and the heat turned on and allowed to run for several minutes prior to the start of monitoring with the Jerome meter.
- Monitoring results will be forwarded to the Environmental Manager assigned to the program.
- In the event of discovery of significantly elevated mercury levels the vehicle will be removed from service and decontaminated. It is recommended that the employee assigned to the vehicle be sent for testing to ensure they have not been exposed to mercury at high levels.
- All vehicles will be tested at the end of the removal program or when they will no longer be utilized for the program.

MERCURY REGULATOR REMOVAL PROGRAM
PROJECT CONTACTS

NAME	OFFICE #	NEXTEL#	NEXTEL PHONE
Anthony Leto	914-789-6604	28339	917-337-5996
Bonnie O'Leary	914-376-8784	52171	917-577-7803
Carol Sylvester	914-376-8978	689	347-386-0728

PUBLIC AFFAIRS CONTACTS

NAME	OFFICE #	PAGER#
Carol Conslato (Qns)	718-275-5652	917-857-5972
Sandy Miller (West)	914-925-6351	917-616-3679

COMPANY OUTREACH CONTACTS

NAME	OFFICE #	PAGER#
Michael Collins	212-460-6721	917-489-0012

also available on our Public Folder, under Con Ed Co of NY/Gas Operations/GA-Gas Operations/ ***GA-SAFETY 2000***.

GAS OPERATIONS
ENVIRONMENT, HEALTH & SAFETY

VP - Eng/Ctrl/EH&S **David Davidowitz**	
Office	(212) 460-4093
Nextel	(917) 921-0338
Pager	(877) 657-5247

General Mgr - EH&S **Lois Westfall**	
Office	(718) 579-1202
Nextel	(917) 578-9790
code	**554**
Pager	(917) 448-0526
Secretary **Rosa Hanlon**	
Office	(718) 579-1203

Environmental Section Manager **Andrea Schmitz**	
Office	(718) 579-1438
Nextel	(917) 337-2138
code	**28362**
Pager	(917) 380-9278

Safety Section Manager **Phyllis Pincus**	
Office	(718) 579-1234
Nextel	(917) 578-8295
code	**264**
Pager	(917) 380-5540

MANHATTAN			
Environmental **Gary Windman**		*Safety* **Lou Faro**	
Office	(212) 427-4200	*Office*	(212) 427-4200
Nextel	(917) 416-7291	*Nextel*	(917) 578-8297
code	**28368**	*code*	**266**
Pager	(917) 632-3482	*Pager*	(917) 380-6462

WESTCHESTER			
Environmental **Kevin Kelly**		*Safety* **Kathy Letscher**	
Office	(914) 789-6694	*Office*	(914) 789-6718
Nextel	(917) 416-7282	*Nextel*	(917) 578-8296
code	**28367**	*code*	**265**
Pager	(917) 380-6681	*Pager*	(917) 448-8180

QUEENS			
Environmental **Ken Heyman**		*Safety* **Mike Ivancich**	
Office	(718) 321-4807	*Office*	(718) 321-6984
Nextel	(917) 416-7280	*Nextel*	(917) 642-5196
code	**28366**	*code*	**28443**
Pager	(917) 380-5280	*Pager*	(917) 380-5077

THE BRONX			
Environmental **Paul Lonseth**		*Safety* **Dave Freeman**	
Office	(718) 579-1310	*Office*	(718) 579-1303
Nextel	(917) 416-7435	*Nextel*	(917) 335-4664
code	**28369**	*code*	**28360**
Pager	(917) 448-0401	*Pager*	(917) 380-7741

CENTRAL					
Environmental **Vic Basso**		*Environmental* **Lima Jones**		*Safety* **Frank Adamo**	
Office	(718) 579-1242	*Office*	(718) 579-1219	*Office*	(718) 579-1218
Nextel	(917) 416-6247	*Nextel*	(917) 337-2165	*Nextel*	(917) 416-5901
code	**28365**	*code*	**28363**	*code*	**28359**
Pager	(917) 616-9312	*Pager*	(917) 380-0696	*Pager*	(917) 380-6890

SUPPORT					
Environmental, ISO **Dan Parrotta**		*Mercury* **Carol Sylvester**		*SHIMS/Central* **Brian Ravinsky**	
Office	(718) 579-1367	*Office*		*Office*	(718) 579-1453
Nextel	(917) 337-7440	*Nextel*	(347) 386-0728	*Nextel*	
code	**28364**	*code*	**689**	*FAX*	(718) 589-8646
Pager	(917) 616-2266	*Pager*	(917) 488-9252	*Pager*	(917) 313-2380

1/31/00

Law Department

2001 Emergency Duty Schedule

Rev. 2

Week Starting	Name	Home Number	Office Number	Pager Number
01/03/01	Sandoli	908-679-3147	469-1144	917-448-7768
01/10/01	McNulty	973-691-2314	469-4533	917 448-0780
01/17/01	Cannon	201 437-7154	460-6603	917 448-1332
01/24/01	Kojes	718 762-7476	460-4534	917 448-0907
01/31/01	Holm	516 433-5508	460-4510	917 380-3771
02/07/01	Mongeau	732 706-5367	460-4274	917 448-0531
02/14/01	Carol	914 423-8240	460-6165	917 448-1331
02/21/01	Perez	516 775-7826	460-4699	917 323-1656
02/28/01	Lind	516 364-1608	460-3298	917 380-6594
03/07/01	Carol	914 423-8240	460-6165	917 448-1331
03/14/01	McNulty	973 691-2314	460-4533	917 448-0780
03/21/01	Cannon	201-437-7154	460-6603	917-448-1332
03/28/01	Kojes	718 762-7476	460-4534	917 448-0907
04/04/01	Holm	516-433-5508	460-4510	917 380-3771
04/11/01	Mongeau	732 706-5367	460-4274	917 448-0531
04/18/01	Sandoli	908-679-3147	460-1144	917-448-7768
04/25/01	Perez	516 775-7826	460-4699	917 3231656
05/02/01	Lind	516 364-1608	460-3298	917 380-6594
05/09/01	Carol	914-423-8240	460-6165	917-448-1331
05/16/01	Sandoli	908-679-3147	460-1144	917 448-7768
05/23/01	McNulty	973 691-2314	460-4533	917 448-0780
05/30/01	Cannon	201 437-7154	460-6603	917 448-1332
06/06/01	Kojes	718 762-7476	460-4534	917 448-0907
06/13/01	Holm	516 433-5508	460-4510	917 380-3771
06/20/01	Mongeau	732 706-5367	460-4274	917 448-0531
06/27/01	Carol	914 423-8240	460-6165	917 448-1331
07/04/01	Lind	516 364-1609	460-3298	917 380-6594
07/11/01	Perez	516-775-7826	460-4699	917-323-1656
07/18/01	Sandoli	908 679-3147	460-1144	917 448-7768
07/25/01	McNulty	973 691-2314	460-4533	917 448-0780
08/01/01	Cannon	201 437-7154	460-6603	917 448-1332
08/08/01	Kojes	718 762-7476	460-4534	917 448-0907
08/15/01	Holm	516 433-5508	460-4510	917 380-3771
08/22/01	Mongeau	732 706-5367	460-4274	917 448-0531
08/29/01	Carol	914 423-8240	460-6165	917 448-1331
09/05/01	Lind	516 364-1608	460-3298	917 380-6594
09/12/01	Perez	516-775-7826	460-4699	917 323-1656
09/19/01	Sandoli	908 679-3147	460-1144	917 448-7768
09/26/01	McNulty	973 691-2314	460-4533	917 448-0780
10/03/01	Cannon	201 437-7154	460-6603	917 448-1332
10/10/01	Kojes	718 762-7476	460-4534	917 448-0907
10/17/01	Holm	516 433-5508	460-4510	917 380-3771
10/24/01	Mongeau	732 706-5367	460-4274	917 448-0531
10/31/01	Carol	914-423-8240	460-6165	917 448-1331
11/07/01	Lind	516 364-1608	460-3298	917 380-6594
11/14/01	Perez	516 775-7826	460-4699	917-323-1656
11/21/01	Sandoli	908 679-3147	460-1144	917 448-7768
11/28/01	McNulty	973 691-2314	460-4533	917 448-0780
12/05/01	Cannon	201 437-7154	460-6603	917 448-1332
12/12/01	Kojes	718 762-7476	460-4534	917 448-0907
12/19/01	Holm	516 433-5508	460-4510	917 380-3771
12/26/01	Mongeau	732 706-5367	460-4274	917 448-0531

Chem Lab

2001 Emergency Duty Schedule

Rev. 1

Week Starting	Name	Home Number	Office Number	Pager Number
01/03/01	EDWARD CHIN	718-961-6234	718-204-4148	917-616-0972
01/10/01	JAMES HENDRICKS	914-423-4440	718-204-4155	917-616-0972
01/17/01	ESTELLE VOLPE	917-738-4801	718-204-4120	917-616-0972
01/24/01	SANDRA PETERS	732-727-8698	718-204-4152	917-616-0972
01/31/01	JEAN CELESTINE	516-486-7703	718-204-4119	917-616-0972
02/07/01	PATRICK KEELAN	201-703-1235	718-204-4142	917-616-0972
02/14/01	ESTELLE VOLPE	917-738-4801	718-204-4120	917-616-0972
02/21/01	EDWARD CHIN	718-961-6234	718-204-4148	917-616-0972
02/28/01	JAMES HENDRICKS	914-423-4440	718-204-4155	917-616-0972
03/07/01	SANDRA PETERS	732-727-8698	718-204-4152	917-616-0972
03/14/01	JEAN CELESTINE	516-486-7703	718-204-4119	917-616-0972
03/21/01	PATRICK KEELAN	201-703-1235	718-204-4155	917-616-0972
03/28/01	EDWARD CHIN	718-961-6234	718-204-4152	917-616-0972
04/04/01	JAMES HENDRICKS	914-423-4440	718-204-4155	917-616-0972
04/11/01	ESTELLE VOLPE	917-738-4801	718-204-4120	917-616-0972
04/18/01	SANDRA PETERS	732-727-8698	718-204-4152	917-616-0972
04/25/01	JEAN CELESTINE	516-486-7703	718-204-4119	917-616-0972
05/02/01	PATRICK KEELAN	201-703-1235	718-204-4142	917-616-0972
05/09/01	EDWARD CHIN	718-961-6234	718-204-4148	917-616-0972
05/16/01	JAMES HENDRICKS	914-423-4440	718-204-4155	917-616-0972
05/23/01	ESTELLE VOLPE	917-738-4801	718-204-4120	917-616-0972
05/30/01	SANDRA PETERS	732-727-8698	718-204-4152	917-616-0972
06/06/01	JEAN CELESTINE	516-486-7703	718-204-4119	917-616-0972
06/13/01	PATRICK KEELAN	201-703-1235	718-204-4142	917-616-0972
06/20/01	EDWARD CHIN	718-961-6234	718-204-4148	917-616-0972
06/27/01	JAMES HENDRICKS	914-423-4440	718-204-4148	917-616-0972
07/04/01	ESTELLE VOLPE	917-738-4801	718-204-4120	917-616-0972
07/11/01	SANDRA PETERS	732-727-8698	718-204-4152	917-616-0972
07/18/01	JEAN CELESTINE	516-486-7703	718-204-4119	917-616-0972
07/25/01	PATRICK KEELAN	201-703-1235	718-204-4142	917-616-0972
08/01/01	EDWARD CHIN	718-961-6234	718-204-4148	917-616-0972
08/08/01	JAMES HENDRICKS	914-423-4440	718-204-4155	917-616-0972
08/15/01	ESTELLE VOLPE	917-738-4801	917-738-4801	917-616-0972
08/22/01	SANDRA PETERS	732-727-8698	718-204-4152	917-616-0972
08/29/01	JEAN CELESTINE	516-486-7703	718-204-4119	917-616-0972
09/05/01	PATRICK KEELAN	201-703-1235	718-204-4142	917-616-0972
09/12/01	EDWARD CHIN	718-961-6234	718-204-4148	917-616-0972
09/19/01	JAMES HENDRICKS	914-423-4440	718-204-4155	917-616-0972
09/26/01	ESTELLE VOLPE	917-738-4801	718-204-4120	917-616-0972
10/03/01	SANDRA PETERS	732-727-8698	718-204-4152	917-616-0972
10/10/01	JEAN CELESTINE	516-486-7703	718-204-4119	917-616-0972
10/17/01	PATRICK KEELAN	201-703-1235	718-204-4142	917-616-0972
10/24/01	EDWARD CHIN	718-961-6234	718-204-4148	917-616-0972
10/31/01	JAMES HENDRICKS	914-423-4440	718-204-4155	917-616-0972
11/07/01	ESTELLE VOLPE	917-738-4801	718-204-4120	917-616-0972
11/14/01	SANDRA PETERS	732-727-8698	718-204-4152	917-616-0972
11/21/01	JEAN CELESTINE	516-486-7703	718-204-4119	917-616-0972
11/28/01	PATRICK KEELAN	201-703-1235	718-204-4142	917-616-0972
12/05/01	EDWARD CHIN	718-961-6234	718-204-4148	917-616-0972
12/12/01	JAMES HENDRICKS	914-423-4440		917-616-0972
12/19/01	ESTELLE VOLPE	917-738-4801	718-204-4120	917-616-0972
12/26/01	SANDRA PETERS	732-727-8698	718-204-4152	917-616-0972
01/02/02	JEAN CELESTINE	516-486-7703	718-204-4119	917-616-0972

Exhibit C

EH&S Subject Matter Expert Areas in Support of Response Activities

	First Contact	Second Contact	Third Contact
Hazardous Substances:			
▪ Fuel oil spills	Dennis Connelly	Harry Coates	Angel Chang
▪ Dielectric fluids (feeders)	Joe Floryshak	Barry Cohen	Mariela Gonzalez
▪ Dielectric fluids (transformers)	Joe Floryshak	Barry Cohen	Steve Ferrone
▪ PCB's	Barry Cohen	Dennis Mirda (IH issues)/Angel Chang (Environ. Issues)	Steve Ferrone
▪ Lead	Greg Slintak	Dennis Mirda	Janet Fox
▪ Mercury	Jeanine Prudhomme	Dennis Mirda	Barry Smerling
▪ Asbestos	George Corcoran	Barry Smerling	Linda Russel Matos
▪ Other chemicals	Phil Pederson	Jeanine Prudhomme	Greg Slintak
▪ Carbon monoxide	Greg Slintak	Phil Pederson	Jeanine Prudhomme
▪ Confined space	Jeanine Prudhomme	Matt McFarland	
Industrial Hygiene:			
▪ Industrial hygiene monitoring	Jeanine Prudhomme	Phil Pederson	Dennis Mirda
▪ General IH	Dennis Mirda	Phil Pederson	Janet Fox
▪ Personal protective equipment	Phil Pederson	Jeanine Prudhomme	Greg Slintak
▪ Respiratory Protection	Jeanine Prudhomme	Greg Slintak	
▪ Infectious wastes and bloodborne pathogens	Greg Slintak	Carmine Guadagnino	
Safety:			
▪ General safety	Matthew McFarland	Paul Walsh	Maria Rodriquez
▪ Fire hazards	Dan Pontecorvo	Lotah Fields	Matthew McFarland
▪ Clear access	George Corcoran	Barry Smerling	
Environmental:			
▪ Sampling Plans	Phil Pederson	Mariela Gonzalez (non-PCB grids)	Jeanine Prudhomme
▪ Sampling	Pat Keelan	Bob Ciullo	Yelena Skorobogatov
▪ Air issues	Anthony Guastafeste	Orlando Cartagena	Oleg Krotoff
▪ Water issues	Richard Ramon	Harry Coates	Eddie Louie
▪ Chemical analysis	Ed Chin	Jimmy Hendricks	
▪ Aquatic ecology	Ken Marcellus		
▪ Wildlife	Ken Marcellus		
▪ Terrestrial biology	Ken Marcellus		
▪ Environmental impact evaluation, and NRDA	Ken Marcellus	Eddy Louie	

	First Contact	Second Contact	Third Contact
▪ Remediation	Eddie Louie	Joseph Floryshak	Neale Bedrock
▪ Spill containment and removal (oil spills to waterways)	Dennis Connelly	Harry Coates	Joe Floryshak
▪ Documentation	Ray Kimmel	Anthony Muratore	Tom Healy
▪ Waste disposal	Steve Ferrone	Anthony Drummings	Robert Ciullo
General:			
Incident Command Structure (ICS) organization	Dennis Connelly	William Wallace	Brian Bellows
Planning Section Chief	George Greenwood	Janet Fox	Neale Bedrock Maria Rodriguez

Note: Personnel mobilized as Subject Matter Experts will be organized within the ICS Planning Section in a Technical Specialists Unit.

EH&S Subject Matter Experts

ject	CEP	CSP	Name	Telephone	Pager
Accident Response/Investigation			Matt McFarland	212-460-3953	917-317-643
Accident Statistics			Carmine Guadagnino	212-460-1067	917-448-123
Acquisitions/Divestitures	11.02		Alan Homyk	212-460-2100	917-649-552
Air Issues	1.00		Anthony Guastafeste	212-460-4858	917-380-764
Aquatic Ecology	9.01		Ken Marcellus	212-460-6059	917-904-676
Asbestos		1.00	George Corcoran	212-460-1132	917-380-984
Carbon Monoxide			Greg Slintak	212-460-1347	917-904-281
CEMS	1.08		Orlando Cartagena	212-460-6368	917-641-975
Chemical Bulk Storage	7.02		Dennis Connelly	212-460-2119	917-632-335
Chemicals			Phil Pederson	212-460-1357	917-788-502
Chemical Evaluation & Selection		9.02	Greg Slintak /	212-460-1347	917-904-281
			Bill Burkett	212-460-1099	917-632-371
Clear Access			George Corcoran	212-460-1132	917-380-984
Comprehensive Emergency Response Plans		24.00	Jim Levin	212-460-2367	
Confined Space		16.00	Jeanine Prudhomme	212-460-1002	917-802-869
Contractor EH&S Plans	12.03		Dennis Mirda	212-460-4586	917-616-097
Consent Order Obligations			Dennis Schmidt	212-460-3679	917-240-997
Critical Correspondence			Joe Panarelli	212-460-4726	917-489-103
Dielectric Fluids	3.06/5.00		Joe Floryshak	718-204-4032	917-380-685
Divestitures	11.02		Alan Homyk	718-204-4292	917-649-552
Documentation			Ray Kimmel	212-460-2211	917-616-075
E2MIS			Ray Kimmel	212-460-2211	917-616-075
EH&S Permits - General			Harry Coates	212-460-2362	917-919-075
EH&S Procedures			Vincent dePass	212-460-2273	917-489-144
ctrical Safety		17.00	Matt McFarland	212-460-3953	917-317-643
Emergency Response (ERT)			Bill Wallace	212-580-6908	917-252-667
EMF			Phil Pederson	212-460-1357	917-788-502
Enclosed Space (Electric)		17.01	Matt McFarland	212-460-3953	917-317-643
Enclosed Space (Gas)		17.02	Matt McFarland	212-460-3953	917-317-643
Environmental Impact Evaluation	11.00		Eddy Louie	718-204-4262	917-616-152
Equipment Guarding		21.00	Paul Walsh	212-460-3552	917-469-005
Ergonomics		23.00	Phil Pederson	212-460-1357	917-788-502
Excavations		13.00	Matt McFarland	212-460-3953	917-317-643
Facility Response Plans	3.05		Dennis Connelly	212-460-2119	917-632-335
Fire Protection Program/FDNY Liaison		14.00	Dan Pontecorvo	212-460-1080	917-380-586
Fire Safety		14.00	Lotah Fields	212-460-6509	917-632-355
Fleet Safety Program			Carmine Guadagnino	212-460-1067	917-448-123
Hazard Communication		9.01	Dennis Mirda	212-460-4586	917-616-097
Hearing Conservation		3.00	Phil Pederson	212-460-1357	917-788-502
IH General			Dennis Mirda	212-460-4586	917-616-097
IH Monitoring			Jeanine Prudhomme	212-460-1002	917-802-869
Incident Command System (ICS) - ER			Dennis Connelly	212-460-2119	917-632-335
Indian Point Safety Support			Dan Pontecorvo	212-460-1080	917-380-586
Infectious Wastes and Bloodborne Pathogens		7.00	Greg Slintak	212-460-1347	917-904-281
Inquiry System			Joe Panarelli	212-460-4726	917-489-103
ISO 14000			Anthony Muratore	212-460-4983	917-448-216
Labor Mgt Safety Issues			Carmine Guadagnino	212-460-1067	917-448-123
Lead		10.00	Greg Slintak	212-460-1347	917-904-281
ckout/Tagout			Matt McFarland	212-460-3953	917-317-643
Manufactured Gas Plant Issues			Yelena Skorobogatov	718-204-4205	917-380-442
Material Handling		19.00	Matt McFarland	212-460-3953	917-317-643

Subject	CEP	CSP	Name	Telephone	Pager
Mechanical Equipment			Matt McFarland	212-460-3953	917-317-643
chanical Equipment Inspection		22.00	Paul Walsh	212-460-3552	917-469-005
Medical and Exposure Reporting		6.00	Jeanine Prudhomme	212-460-1002	917-802-869
Mercury		11.00	Jeanine Prudhomme	212-460-1002	917-802-869
New EH&S Equipment Services		9.03	Janet Fox /	212-460-3968	917-616-326
			Bill Burkett	212-460-1099	917-632-371
Non-Asbestos Insulation		2.00	Greg Slintak	212-460-1347	917-904-281
Oil Spills	3.06		Dennis Connelly	212-460-2119	917-632-335
OSHA			Janet Fox	212-460-3968	917-616-326
PCBs	6.00		Barry Cohen	212-460-6291	917-314-690
PINNACLE Program			Carmine Guadagnino	212-460-1067	917-448-123
Pollution Prevention	12.02		Mariela Gonzalez	212-460-1195	917-556-792
Portable Tools		20.00	Paul Walsh	212-460-3552	917-469-005
PPE		5.00	Phil Pederson	212-460-1357	917-788-502
Real Estate Assessments (Phase I/II)	11.01		David Rubin	718-204-4219	917-802-940
Recordkeeping & Reporting		8.00	Carmine Guadagnino	212-460-1067	917-448-123
Regulatory Agency Liaison			Janet Fox	212-460-3968	917-616-326
Remediation			Eddy Louie	718-204-4262	917-616-152
Respiratory Protection		4.00	Jeanine Prudhomme	212-460-1002	917-802-869
Risk Analysis			Jeanine Prudhomme	212-460-1002	917-802-869
Safety -- General			Matt McFarland	212-460-3953	917-317-643
Safety Equipment Program		9.03	Matt McFarland	212-460-3953	917-317-643
Safety Inspections/Reports		8.00	Lotah Fields	212-460-6509	917-632-355
Safety Shoes and Eyewear		5.02	Carmine Guadagnino	212-460-1067	917-448-123
Safety Training Videos			Phyllis Burnett	212-4604395	917-802-980
Sampling	12.04		Pat Keelan /	718-204-4142	917-802-036
			Phil Pederson	212-460-1357	917-788-502
SARA	7.04		Bill Burkett	212-460-1099	917-632-371
Scaffolding		18.00	Matt McFarland	212-460-3953	917-317-643
SHIMS Program			Ray Kimmel	212-460-2212	917-616-075
SPCC Plans	3.04		Harry Coates	212-460-2362	917-919-075
SPDES	2.02/2.03		Rich Ramon	212-460-2262	917-380-5415
Subsidiary EH&S Liaison			Alan Homyk	212-460-2100	917-649-5526
Terrestrial Biology	9.01		Ken Marcellus	212-460-6059	917-904-676
UST Releases	12.01		Maureen Sicherman	718-204-4236	917-317-466
Waste Characterization,Transport, Disposal	5.00		Steve Ferrone	212-460-1223	917-706-831
Waste Management Facility Approvals			Bharat Mukhi	718-204-4267	917-706-734
Water	2.00		Rich Ramon /	212-460-2262	917-380-541
			Harry Coates	212-460-2362	917-919-075
Welding and Burning		15.00	Phil Pederson	212-460-1357	917-788-502
Wildlife	9.01		Ken Marcellus	212-460-6059	917-904-676
Work at Elevations		18.00	Paul Walsh	212-460-3552	917-469-005
Work Area Protection			Paul Walsh	212-460-3552	917-469-005
Work Rules & Regulations			Matt McFarland	212-460-3953	917-317-643

Mercury Spill Prevention Kit-Complete
Class & Stock # 638-1669

Description	Quantity	Price	Extended Price	Con Ed Price
Mercury Spill Pad	2	$7.80	$15.60	689-3382
Bucket	1	$10.50	$10.50	025-3385
Drum Liner	1	$7.85	$7.85	025-3732
Thin Plastic Bag	4	$0.13	$0.52	025-1397
17"x19" pads	2	$1.60	$3.20	638-1412
1" Screw Plugs	2	$0.50	$1.00	332-3110
1" Screw Caps	1	$0.86	$0.86	332-7681
3/4" Screw Plug	1	$0.25	$0.25	332-2484
Nitrile Gloves	1	$3.89	$3.89	680-8695
Latex Gloves	1	$0.03	$0.03	680-7127
Haz. Waste Label	1	$0.72	$0.72	024-6595
Corrosive Label	1	$0.07	$0.07	659-5128
Shipping Paper	1	$0.05	$0.05	653-4069
Regulator Bags	3	$0.20	$0.60	025-3377
Plastic Booties	1	$4.26	$4.26	687-0000
Labor		$15.00	$15.00	

Mercury Spill Prevention Kit-Refill
Class & Stock # 638-1677

Description	Quantity	Price	Extended Price	Con Ed Price
Mercury Spill Pad	2	$7.80	$15.60	689-3382
Thin Plastic Bag	4	$0.13	$0.52	025-1397
17"x19" pads	2	$1.60	$3.20	638-1412
1" Screw Plugs	2	$0.50	$1.00	332-3110
1" Screw Caps	1	$0.86	$0.86	332-7681
3/4" Screw Plug	1	$0.25	$0.25	332-2484
Nitrile Gloves	1	$3.89	$3.89	680-8695
Latex Gloves	1	$0.03	$0.03	680-7127
Haz. Waste Label	1	$0.72	$0.72	024-6595
Corrosive Label	1	$0.07	$0.07	659-5128
Shipping Paper	1	$0.05	$0.05	653-4069
Regulator Bags	3	$0.20	$0.60	025-3377
Plastic Booties	1	$4.26	$4.26	687-0000
Labor		$15.00	$15.00	

Revised 06/01/01

Con Edison
Westchester
Consolidated Edison Company of New York, Inc.
315 Old Saw Mill River Road, Valhalla, N.Y. 10595

March 23, 2001

ANGELO DIGIORGIO
6 SYLVAN RD, PD
TOWN OF RYE, NY 10573

SERVICE ADDRESS:
6 SYLVAN RD
TOWN OF RYE, NY 10573

Reference No. : WH99044527
Meter No. : 2972051

Dear Con Edison Customer:

Con Edison is committed to environmental excellence. With that in mind, we have begun a program to install mercury-free regulators on gas lines, replacing regulators that contain mercury. We will be in your area during the next month to replace these devices, and one of our mechanics will need to have access to our gas equipment. Con Edison's gas mechanics are highly skilled professionals; they use special removal kits to avoid any spillage of mercury when they remove these regulators, and are also trained to properly handle and dispose of the mercury in a safe and environmentally correct manner. The replacement will take up to three hours. Please contact us to schedule an appointment.

You can reach us Monday through Friday 7:30 am to 7:00 pm at any of the phone numbers listed below. For your convenience, we can schedule evening and weekend appointments. Please reference the 10-digit number at the top of this letter when calling for an appointment. :

(914) 376-6631 (914) 376-6629

If you smell gas or suspect a gas leak, call toll-free 1-(800)-75-CONED, 24 hours a day, 7 days a week. We look forward to your call. We recognize this may be an inconvenience but it will be well worth your time to allow us to remove this mercury equipment from your premises.

Anthony F. Leto

Anthony F. Leto
Section Manager
Gas Distribution Services
Ref: WH99044527 03/23/2001

The following are some common questions and answers about regulators and mercury. If you have any other questions, you can speak with our representative when you call to make your appointment.

What Is A Gas Regulator?
A regulator controls the gas pressure to your appliances. Older units, like the one in your home, use mercury in the control mechanism. Our mechanic will remove this device, and replace it with a mercury-free unit.

What Is Mercury?
Mercury is a liquid metal found in fluorescent lamps, thermostats, batteries, thermometers and other items commonly found in the home. It is also used in medical equipment and in some dental fillings.

Is Mercury Dangerous?
When used and disposed of properly, mercury presents no hazard. If mercury is spilled, the most common forms of exposure are by contact with the skin or through inhalation of mercury vapors. The mercury in your gas regulator is not a hazard if it remains undisturbed. However, if someone disturbs the regulator there is a chance for spillage. That's why we want a trained Con Edison mechanic to replace it. We will also dispose of the device properly.